

EXHIBIT “A”

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**FIRST MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
DECEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

| | | |
|--|--|---------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 12/01/2022 | 12/31/2022 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$62,460.00 ¹ (80% of \$78,075.00) | |
| Total Reimbursable Expenses Requested in this Statement: | \$506.65 ² | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$77,550.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 130.00 | |
| Average Hourly Rate for Attorneys: | \$596.54 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$525.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 2.10 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |

¹ Counsel is holding \$146,790.16 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") first monthly fee statement for compensation (the "Fee Statement") for the period of December 1, 2022 through December 31, 2022 (the "Fee Period") filed pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O requests: (a) allowance of compensation in the amount of \$62,460.00 (80% of \$78,075.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$506.65 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period December 1, 2022 through December 31, 2022, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses

within each category, including description, incurred with the amounts for which reimbursement is requested. Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained

Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration

of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$62,460.00 (80% of fees in the amount of \$78,075.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$506.65 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$62,966.65 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: January 27, 2023

/s/ Shelby A. Jordan
SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
State Bar No. 24074839
S.D. No. 1127322
Jordan & Ortiz, P.C.
500 North Shoreline Blvd., Suite 900
Corpus Christi, TX 78401
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on January 27, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. DECEMBER INVOICE FOR PERIOD
DECEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

JORDAN FLORITZ
 500 N. SHORELINE BLVD, SUITE 900
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

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 January 27, 2023
 Account No: 5481-002000M
 Statement No: 922199

Bankruptcy

| | | | | | Hours |
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| 12/02/2022 | CRM | B110 | A103 | Draft/revise notice of appearance for Shelby Jordan as counsel for Alex Jones; file same. | 0.50 |
| | SAJ | B110 | A108 | Conference with C&D on all pending issues of filing and emails discussing filing and review final documents; conference with client for final approval; telephone conference with client and in office regarding filing approval; telephone conference with client and in office regarding filing and filing statements and schedules; work on statement to employees regarding Ch 11 filing (2.0); work on audience statement for TAJ show (0.2); discuss status of filing of notice an initial status conference and notices (work on matrix issues and parties in interest) with client appearing (1.3); work on gathering all documents, scheduling Monday for meeting with CRO and parties having books and records; telephone meeting with Bob Roe; work on documents for Monday schedule for meeting with co-counsel in Austin (2.7). | 6.20 |
| | SAJ | B190 | A107 | Conference with Pattis regarding status of judgment and appellate timing (0.5); emails to and from Texas trial counsel (0.4); receive and review new Conn pleadings; work on conflicts of law and conflicts of threatened sua sponte seizure over parties not before the Conn court (Jones affiliates as "property of the estate") (0.6); work on notice of auto stay regarding entry of agreed lift stay to coordinate with FSS and its agreed lift stay to coordinate appellate timelines and deadlines (0.6). | 2.10 |
| 12/03/2022 | SAJ | B110 | A103 | Work on draft V1 and V2 of Debtor's Initial Status Report; emails to new CRO, co-counsel regarding Monday schedule and meeting arranged for preparation of accounting and schedules and for initial status report and initial status conference with Court (3.0); review recent new quotes from Plaintiffs counsel for appeal (0.8); begin to work on issues of debtor pre-petition draws and asset schedules for net worth (1.0). | 4.80 |
| 12/04/2022 | SAJ | B410 | A106 | Meeting with client; work on issues regarding all bank accounts | |

Bankruptcy

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| and meeting with PQPR to understand access and working relationship to all accounts; call to ESG regarding status and timing of post-petition work (1.0); work on issues of DIP conduct and accounting with client (0.6) | | | | 1.60 |
| SAJ | B120 | A104 | Continue to work on organizing assets and affiliate entities and affiliate entities for new CRO and gather information on all affiliate entities transactions and compare to discovery/deposition review to assure thoroughness. | 2.00 |
| SAJ | B310 | A103 | Work on claims bar date and circulate to co-counsel with proposed order (0.5); work on claims analysis issues and plan confirmation issues (1.0); estimation and claims bar dates process and procedures (0.3); work on status report for court on administrative claims of debtor due from FSS (0.5). | 2.30 |
| SAJ | B210 | A108 | Conference with PQPR regarding all affiliate and related bank accounts and business records. | 0.65 |
| 12/05/2022 | SAJ | B110 | A107 Conference with co-counsel on all asset issues and accounting issues involving schedules and statements of affairs, listing of assets including opportunities; download multiple files and discuss with CRO team regarding initial accounting and analysis of actual net worth, schedules or draws (checking for actual business expenses designated as a draw; prepare edits to initial status conference reports and circulate; work on demonstrative of draws and average draws per year. | 2.40 |
| SAJ | B210 | A106 | Conference with client regarding bank accounts; call and arrange appointment and conference call with Bob Roe regarding meeting schedule tomorrow and accounting issues to meet with CRO team. | 0.65 |
| SAJ | B410 | A106 | Conference with client regarding all current operations and issues of DIP; how to deal with post-petition ESG agency and accomplish regarding past, current and future investment in inventory purchases for consignment to FSS; how to organize bank accounts and how to insure accurate inventory for storage rooms with property of the estate; work on scheduling inventory and appraisal issues; set up meeting with Debtor and new CRO. | 2.00 |
| SAJ | B185 | A107 | Conference with co-counsel regarding salary contract, indemnity and motion to assume or reject executory contracts including employment agreement (0.2); conference with Battaglia regarding salary budget expenses adjustment and timing and indemnity agreement (0.2). | 0.40 |
| SAJ | B190 | A103 | Work on pleading for estimation of claims; prepare and circulate memo in connection with issues of discharge. | 0.60 |
| SAJ | B190 | A104 | Work on an respond to suggestion of bankruptcy filed in Travis | |

JONES, ALEX

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Bankruptcy

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| | | | | County and pull research and update holding not an appearance in the removed case; pull research and send to parties and Plaintiffs counsel that notice only is required to invoke the automatic stay; conference with Andino Reynal regarding his appellate issues. | 1.40 |
| | SAJ | B185 | A106 | Conference with client regarding status of expectancy. | 0.40 |
| 12/06/2022 | SAJ | B110 | A106 | Meeting with client and CRO; meeting with co-counsel and CRO; conference with client in office regarding handling and accounting for all cash, handling payment of bills and accurate reporting of all credit card charges; handling contracts and new contract opportunities (2.8); conference with Bob Roe regarding historical operations, historical records; other accounting issues (0.6); review and circulate email and memo on Rule 2019(b) BRP to require all counsel representing more than one client to file verified statement (0.5) | 3.90 |
| | SAJ | B120 | A103 | Work on debtor asset summaries and conference with CRO regarding appraisals to the Ranch and Lake Travis house. | 0.20 |
| | SAJ | B140 | A107 | Conference with co-counsel regarding motion for relief from stay regarding FSS stay through entry of judgment and impact on creating two appeal proceedings. | 0.50 |
| | SAJ | B185 | A104 | Work on issues of default by FSS and enforcement of Debtor's employment contract with FSS; review draft for edits; conference with debtor. | 0.80 |
| | SAJ | B190 | A103 | Circulate detailed memo on 5th Circuit case regarding final judgments only; pull authority that a Federal court case filing included a bankruptcy or a contested matter objection to a claim or seeking estimation of claims and determining discharge actions. Begin outline for mediation statement including these points. | 2.70 |
| | SAJ | B190 | A104 | Work on and research appellate issues for state court stay issues; circulate to co counsel along with research on filing suggestion of bankruptcy and non-appearance in case; pull and forward case for violation of auto stay for any non-ministerial action by court or parties and liability of counsel in removal. | 1.10 |
| 12/07/2022 | CRM | B190 | A109 | Prepare, appear (remotely) and attend status conference. | 0.60 |
| | SAJ | B110 | A109 | Houston meeting with Liz Freeman; meeting with co-counsel; prepare and attend hearing on initial status conference; conference with client regarding status report (no travel included); post hearing telephone conference with client and co-counsel. | 3.30 |
| | SAJ | B310 | A104 | Research and memo preparation regarding standard of proof and mediation statement inclusion; analysis of each cause of | |

JONES, ALEX

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Bankruptcy

| | | | | | Hours |
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| | | | | action in Texas and Conn compensatory damages and default; for each of Texas and Conn punitive damages standard of proof; impact of limitations on standard of proof. | 3.10 |
| | SAJ | B195 | A109 | Trip to Houston to attend status conference (billed at half). | 2.60 |
| 12/08/2022 | SAJ | B110 | A106 | Conference with client regarding status of donations accounts and assure account handling and deposit in DIP account. | 0.70 |
| | SAJ | B120 | A104 | Continue to review of documents for schedules and statements; emails to new CRO and two meeting with debtor to organize and document various assets and asset opportunities with "brand" and with affiliates. | 2.00 |
| | SAJ | B140 | A107 | Conference with Battaglia and work on issues of appeal and entry of judgments coordinated between the two debtors to avoid two-track appeal in same case. | 0.80 |
| | SAJ | B190 | A107 | Conference with Norm Pattis regarding status of appeal issues for Conn appeal and status of retainer and costs to be incurred. | 0.40 |
| | SAJ | B110 | A107 | Conference with Norm Pattis regarding status of contribution account and location and turn over to estate. | 0.70 |
| | SAJ | B210 | A103 | Work on DIP budget issues and stop charges by FSS to DIP account for internet access. | 0.70 |
| | SAJ | B110 | A107 | Email to CRO; call and emails to co-counsel regarding pull down hearing on salary; prepare for hearings on 16th and 19th and 341 meeting. | 0.70 |
| 12/09/2022 | SAJ | B110 | A107 | Telephone conference with co-counsel to prepare for next week work by CRO with debtor; discuss next Friday hearing and planning, strategy, zoom and related issues. | 1.30 |
| | SAJ | B120 | A104 | Work on 2017 to current asset and asset opportunities-transactions for valuation and scheduling. | 1.20 |
| | SAJ | B310 | A103 | Prepare V1 memo on claims estimation/dischargeability and full review and determination of "claims" non-tort (Defamation and bankruptcy court's jurisdiction to determine) and intentional infliction as a personal injury claim; work on mediation statement V8. | 3.60 |
| | SAJ | B190 | A103 | Work on V9 of mediation statement and summary of BR strategy; circulate. | 2.40 |
| 12/10/2022 | SAJ | B190 | A103 | Work on V10 of mediation statement section on summary and strategy of debtor's Chapter 11 case; incorporate edits and changes from co-counsel. | 2.20 |
| 12/12/2022 | SAJ | B110 | A106 | Conference with client regarding week scheduling, meeting | |

JONES, ALEX

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Bankruptcy

| | | | | | Hours |
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| | | | | regarding additional information on assets and transactions; review of last two depositions referencing assets. | 1.60 |
| | SAJ | B110 | A107 | Conference with Steve Lemmon regarding access to PQPR information; conference with co-counsel regarding same. | 0.70 |
| | SAJ | B190 | A103 | Continue to work on V10 mediation statement and issues to be discussed with mediator; work on scheduling mediator call and zoom regarding going forward after Plaintiffs mediator meeting; request for conference call with mediator. | 3.70 |
| 12/13/2022 | SAJ | B120 | A107 | Conference with co-counsel regarding meeting with debtor and asset analysis; work on recovery of deposition of debtor regarding testimony about assets, property, affiliates. | 1.00 |
| | SAJ | B190 | A103 | Continue to work on mediation statement; conference with Pattis regarding depositions and current status of issues; continue work on research; schedule zoom conference with mediator and emails to Ray Battaglia and co-counsel regarding timing and attendance; attend zoom conference with mediator. | 4.10 |
| 12/14/2022 | SAJ | B110 | A106 | Conference with client regarding hacking and disclosures; discuss with client and Battaglia seeking bankruptcy court relief for hacked and stolen confidential information; determine damages, if any, by third parties attempting de-platforming as a violation of the automatic stay. | 0.85 |
| | SAJ | B110 | A107 | Conference with co-counsel; conference with consignment lender rep; conference with FSS counsel and request conference with FSS CRO. | 0.85 |
| | SAJ | B190 | A107 | Discuss with co-counsel and debtor the appeal strategy and modification to allow appeals to proceed. | 0.30 |
| | SAJ | B120 | A107 | Meeting and discussions continued efforts at asset and liability discovery analysis with co-counsel, financial advisor, debtor. | 1.70 |
| | SAJ | B150 | A104 | Review appointment of creditors committee and compare to memo of Conn v Texas Plaintiffs (circulate). | 0.15 |
| | SAJ | B150 | A106 | Conference with client on committee function, make-up and representation. | 0.15 |
| | SAJ | B185 | A103 | Work on FSS contracts regarding \$900,000 due debtor from FSS post-petition for the purchase of product to be sold; work on contracts potential for celebrity endorsements and celebrity endorsements. | 0.90 |
| | SAJ | B185 | A107 | Conference with ESG; review details for third party promoted products. | 0.90 |
| | SAJ | B190 | A103 | Continue to work on mediation statement V11 and prepare | |

Bankruptcy

| | | | | | Hours |
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| initial statement for service on mediator. | | | | | 2.20 |
| 12/15/2022 | SAJ | B140 | A107 | Review and comment on order for lift stay agreement with Akin Gump to coordinate entry of judgments for appeal purposes; email to Andino regarding attorneys fees and appeals and employment. | 0.60 |
| | SAJ | B320 | A104 | Review and comment on cash collateral and issues of executory contract concerns; send demonstrative on potential post-petition contracts including celebrity endorsement income and reporting all sources of income in MOR and to estate. | 1.00 |
| | SAJ | B190 | A103 | Draft/revise summary for mediation after conference with mediator; work on driving issue in mediation; secondary issue of claims objections; and other mediation issues; begin update to V11. | 2.40 |
| 12/16/2022 | SAJ | B110 | A104 | Review/analyze and comment on witness list and related exhibits including new budget and does not deal with salary. | 1.00 |
| | SAJ | B185 | A103 | Draft/revise and circulate demonstrative on post petition contract negotiations and request a copy of Celebrity Endorsement contract. | 1.00 |
| | SAJ | B160 | A107 | Notice to Norm Pattis (Conn appeal counsel) that fee is likely to be hourly; cc: Driver; conference with Pattis. | 0.40 |
| | AO | B110 | A105 | Conference with Shelby Jordan regarding preparation for hearing on 12/19. | 0.60 |
| 12/19/2022 | SAJ | B110 | A103 | Prepare the initial debtor's conference form and circulate; prepare and attuned with debtor and co-counsel the initial debtor's conference. | 1.20 |
| | SAJ | B410 | A106 | Meeting with client and co-counsel; work on all outstanding administrative and reporting issues dealing with new financial advisors requests; discuss and review the MOR filings by FSS and discuss the confusing issues created by the delayed accounting and systems of FSS CRO; discuss issues with the FSS CRO Patrick McGill (1.4); call from Ray Battaglia regarding cash collateral in FSS and discuss with client the continued refusal to restore the contract rate salary (0.4). | 1.80 |
| | SAJ | B140 | A101 | Prepare with client and co-counsel regarding hearings on cash collateral motion and prepare debtor on responses to Court's questions, if nay, at hearing. | 2.60 |
| | SAJ | B140 | A106 | Meeting with client and review issue of relief from stay, payment of percent of costs of appeal by this estate and by FSS and discuss reference to appellate counsel and restrictions on fees and alternatives if cash flow cannot be maintained. | 1.00 |

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| | | | | | Hours |
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| | SAJ | B160 | A103 | Work on Jordan & Ortiz application to employ and prepare for filing. | 0.80 |
| | SAJ | B190 | A103 | Finish intro of V12 mediation statement and circulate to co-counsel. | 0.80 |
| | AO | B110 | A105 | Attend hearings and prepare memo for circulation. | 3.00 |
| 12/20/2022 | SAJ | B210 | A107 | Conference regarding FSS and operations for Oct Nov 2022; discussion of operations and disclosures of extremely confidential information; morning debtor conference regarding impact of confidential disclosures and impact of Debtor's estate by deplatforming; work on status of FSS and its CRO and decisions to deal operations and employment agreement; requested accounting budgeting for January and February. | 2.60 |
| | SAJ | B160 | A103 | Prepare final draft of Fee Application and circulate; work on interim order for fee payments. | 2.30 |
| | SAJ | B180 | A107 | Request FSS action to seek preference payments and issues to be raised in mediation; discuss and determine whether funding of cash by Jones pre-petition as basis of preference by Jones estate; research punitive preference payments. | 1.70 |
| 12/21/2022 | CRM | B160 | A103 | Review and revise Shelby Jordan fee application, order and declaration; file and serve same. | 1.00 |
| | SAJ | B210 | A106 | Review/analyze email from Zensky regarding donations; emails to debtor forwarding; conference with debtor and emails to co-counsel on information gathering and outline of response; review with Pattis donation accounts and accounting. | 1.20 |
| | SAJ | B160 | A103 | Finalize and file retention application for Jordan & Ortiz. | 0.80 |
| | SAJ | B160 | A106 | Conference with client regarding interim payments and income funding; emails to co-counsel to prepare FSS form of interim compensation; send word version. | 1.00 |
| | SAJ | B185 | A101 | Work on preparation for hearing on executory employment contract of Jones with FSS; send full financial summary of pre-payments by Jones of FSS expenses without reimbursements; work on issues of Jones administrative expense claims of FSS; send memo on "indemnity" set out in employment agreement and issue of statutory right to indemnity. | 2.40 |
| 12/22/2022 | SAJ | B190 | A103 | Work on mediation issues outline for inclusion in mediation statement V13. | 1.30 |
| | SAJ | B310 | A107 | Conference with co-counsel regarding hearing conflict on salary issues and other client mediation; forward outline of | |

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| | | | | | Hours |
|------------|-----|------|------|---|-------|
| | | | | proof on debtor background and administrative claims due by FSS to Jones including travel, advances for Conn trial and for consignment, etc. | 2.70 |
| 12/23/2022 | SAJ | B110 | A106 | Review PQPR sales reconciliation and discuss with client issues of accounting and reporting; discuss status of consignment of Platinum products to be sold by FSS and how disbursements of those proceeds will be handled including ESG agent handling. | 1.30 |
| | SAJ | B110 | A104 | Email and review the notice of hearing docket 76 for assumption/rejection of employment agreement. | 0.30 |
| | SAJ | B160 | A103 | Complete declaration of disclosure of fees paid in year before bankruptcy; work on final copies of fee application and final draft of interim fee payments; filing. | 1.10 |
| | SAJ | B190 | A107 | Conference with Norm Pattis regarding appellate points, status of appeal issues and status of notice of appeal post judgment; edits and thoughts sent to Pattis. | 1.00 |
| | SAJ | B190 | A105 | Conference with client regarding appeal and texas appeal; receive and review memorandum of decision entered by Judge Belis in Connecticut and discuss with debtor. | 1.00 |
| | SAJ | B190 | A107 | Email to co-counsel regarding Rule 2004 examination and Zensky demands and regarding Rule 2004 notice; gather and forward to co-counsel the documents previously furnished to the Sub-V Trustee voluntarily marked "Mediation Privileged" | 1.80 |
| 12/27/2022 | SAJ | B210 | A107 | Zoom conference call with DIP lender attorney and co-counsel; review and discuss mediation ordered and the extension of FSS dischargeability deadline and both documents application to debtor. | 1.20 |
| | SAJ | B410 | A107 | Email and conference with co-counsel regarding publication of deposition testimony by Plaintiffs and request of Committee Counsel to assist in pulling down. | 0.30 |
| | SAJ | B120 | A104 | Review/analyze and verify return of quitclaim deeds and title to Jones of the Travis Lake House and the Guadalupe County 124 Acres from the 2022 appeal bond trust; forward to financial officers for inclusion in schedules; verify filing in the deed records for return of assets to the estate. | 0.60 |
| | SAJ | B160 | A107 | Reply to email from co-counsel regarding UST question about J&O representation of any parties in interest to Jones "in other matters"; email to co-counsel; reply none in any matter. | 0.20 |
| | SAJ | B190 | A107 | Email and conference with co-counsel on mediation order that must be approved by Plaintiffs counsel. | 0.30 |

JONES, ALEX

Page: 9

January 27, 2023

Account No: 5481-002000M
Statement No: 922199

Bankruptcy

| | | | | | Hours | |
|------------|-----|------|------|---|--------|-----------|
| | SAJ | B310 | A104 | Review/analyze status of loan and debtor's guaranty with security state bank of crawford; conference with client; request copies of loan documents and location of loan collateral (Winnebago travel vehicle). | 0.40 | |
| 12/28/2022 | SAJ | B110 | A103 | Work on outline of issues to consider in salary motion and evidence; work on issue of confidentiality to avoid matters of production sent to the news and press; email to and from co-counsel regarding need for confidentiality agreement in response to David Zensky. | 1.00 | |
| | SAJ | B410 | A104 | Review/analyze order on FSS extension of the deadline for dischargeability; send email to co-counsel regarding preparation for V13 outline of all issues for mediation statement. | 0.50 | |
| | SAJ | B160 | A107 | Respond to UST questions about related party of affiliate representation (response, none). | 0.70 | |
| | SAJ | B180 | A107 | Emails to co-counsel and Battaglia regarding need to consider bringing the avoidance actions. | 0.60 | |
| | SAJ | B190 | A104 | Review/analyze two orders sent by Akin Gump on mediation; send edit thoughts to co-counsel; work on dischargeability research section for mediation statement V14. | 1.00 | |
| 12/30/2022 | SAJ | B210 | A107 | Conference with co-counsel update and discussion of all pending matters; email to debtor; call to debtor. | 1.00 | |
| | | | | For Current Services Rendered | 132.10 | 78,075.00 |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 126.40 | \$600.00 | \$75,840.00 |
| ANTONIO ORTIZ | Partners | 3.60 | 475.00 | 1,710.00 |
| CHRYSTAL MADDEN | Paralegals | 2.10 | 250.00 | 525.00 |

| | | | | |
|------------|------|------|--|-----------|
| 12/30/2022 | B110 | E111 | 12/5/22 - The Grove - Working lunch for Crissie Stephenson, Vickie Driver, Harold Kessler, Allison Gerard | 126.04 |
| 12/30/2022 | B110 | E111 | 12/6/22 - Panera - Working lunch for Crissie Stephenson, Vickie Driver, Harold Kessler, Bob Schleizer, Shelby Jordan, Allison Gerard | 199.85 |
| 12/31/2022 | B110 | E112 | CSC - Recording Fees for Travis Co and Guadalupe County | 91.98 |
| 12/31/2022 | B110 | E124 | Parking - Hearing in Travis Co | 15.00 |
| 12/31/2022 | B110 | E132 | Bankruptcy Photocopies (.20 per page) | 7.30 |
| 12/31/2022 | B110 | E124 | Computer Research - Lexis | 66.48 |
| | | | Total Expenses | 506.65 |
| | | | Total Current Work | 78,581.65 |

Account No: 5481-002000M
Statement No: 922199

Bankruptcy

Balance Due \$78,581.65

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|------------------|-----------------|
| B110 | Case Administration | 21515.00 | 506.65 |
| B120 | Asset Analysis and Recovery | 5220.00 | 0.00 |
| B140 | Relief from Stay/Adequate Protection Proceedings | 3300.00 | 0.00 |
| B150 | Meetings of and Communications with Creditors | 180.00 | 0.00 |
| B160 | Fee/Employment Applications | 4630.00 | 0.00 |
| B180 | Avoidance Action Analysis | 1380.00 | 0.00 |
| B185 | Assumption/Rejection of Leases and Contracts | 4080.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 19830.00 | 0.00 |
| B195 | Non-Working Travel | 1560.00 | 0.00 |
| B100 | Administration | <u>61,695.00</u> | <u>506.65</u> |
| B210 | Business Operations | <u>4800.00</u> | <u>0.00</u> |
| B200 | Operations | <u>4,800.00</u> | <u>0.00</u> |
| B310 | Claims Administration and Objections | 7260.00 | 0.00 |
| B320 | Plan and Disclosure Statement (including Business Plan) | <u>600.00</u> | <u>0.00</u> |
| B300 | Claims and Plan | <u>7,860.00</u> | <u>0.00</u> |
| B410 | General Bankruptcy Advice/Opinions | <u>3720.00</u> | <u>0.00</u> |
| B400 | Bankruptcy-Related Advice | <u>3,720.00</u> | <u>0.00</u> |

Your trust account #1 balance is

| | |
|-----------------|--------------|
| Opening Balance | \$146,790.16 |
| Closing Balance | \$146,790.16 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 36.40 | 0.50 |
| B120 Asset Analysis and Recovery | 8.70 | |
| B130 Asset Disposition | 0.00 | |
| B140 Relief from Stay/Adequate Protection | 5.50 | |
| B150 Meetings of & Communications with Creditors | 0.30 | |
| B160 Fee/Employment Applications | 7.30 | 1.00 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | 2.30 | |
| B185 Assumption/Rejection of Executory Contracts | 6.80 | |
| B190 Other Contested Matters | 32.80 | 0.60 |
| B195 Non-Working Travel | 2.60 | |
| B210 Business Operations | 8.00 | |
| B220 Employee Benefits/Pensions | 0.00 | |
| B230 Financing/Cash Collections | 0.00 | |
| B240 Tax Issues | 0.00 | |
| B250 Real Estate | 0.00 | |
| B260 Board of Directors Matters | 0.00 | |
| B310 Claims Administration and Objections | 12.10 | |
| B320 Plan and Disclosure Statement | 1.00 | |
| B410 General Bankruptcy Advice/Opinions | 6.20 | |
| B420 Restructurings | | |
| TOTALS: | 130.00 | 2.10 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**SECOND MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JANUARY 1, 2023 THROUGH JANUARY 31, 2023**

| | | |
|---|--|----------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 01/01/2023 | 01/31/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$22,500.00 ¹ (80% of \$28,125.00) | |
| Total Reimbursable Expenses Requested in this Statement: | \$102.50 ² | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$26,400.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 44.00 | |
| Average Hourly Rate for Attorneys: | \$639.20 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$1,725.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 6.90 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |

¹ Counsel is holding \$84,393.51 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") second monthly fee statement for compensation (the "Fee Statement") for the period of January 1, 2023 through January 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$22,500.00 (80% of \$28,125.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$102.50 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period January 1, 2023 through January 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested.

Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained

Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$22,500.00 (80% of fees in the amount of \$28,125.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$102.50 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$22,602.50 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: February 15, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 900

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on February 15, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. DECEMBER INVOICE FOR PERIOD
JANUARY 1, 2023 THROUGH JANUARY 31, 2023**

500 N. SHORELINE BLVD, SUITE 900
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
February 15, 2023
Account No: 5481-002000M
Statement No: 922213

Bankruptcy

| PREVIOUS BALANCE | | | | | \$77,869.15 |
|------------------|-----|------|------|--|-------------|
| | | | | | Hours |
| 01/01/2023 | SAJ | B210 | A106 | Call to debtor regarding funding of personal expenses and advances from third parties and issues. | 0.30 |
| 01/03/2023 | SAJ | B120 | A107 | Call to counsel Minton regarding divorce documents for Vickie to review (no reply). | 0.30 |
| | SAJ | B185 | A108 | Respond to emails from auditors for information regarding consignment agreement through ESG and FSS and send spreadsheet in native format for review. | 0.40 |
| | SAJ | B190 | A103 | Work on mediation report and update briefing for Isgur statement. | 1.70 |
| | SAJ | B190 | A107 | Conference with Conn appeal counsel Pattis regarding status of appeal and appellate points reviewed. | 0.80 |
| 01/04/2023 | SAJ | B160 | A107 | Review UST questions and request for further information and complete and email to co-counsel with answers, notice to UST that answer will be forwarded. | 1.00 |
| | SAJ | B190 | A103 | Continue to work on mediation report briefing on question of dischargeability (evidentiary burden of proof, default; sanctions denying defenses, etc.). | 1.70 |
| 01/05/2023 | SAJ | B110 | A104 | Review and comment to co-counsel on Stipulation by FSS regarding deadline for dischargeability and application to Debtor's case. | 0.20 |
| | SAJ | B110 | A107 | Emails with co-counsel regarding meeting yesterday with FSS CRO and debtor. | 0.30 |
| | SAJ | B120 | A108 | Review file for notes and records and contact David Jones to obtain copy of the Missouri Trust (.5); email to co-counsel and response email and further search for documents (.5). | 1.00 |
| | SAJ | B160 | A107 | Begin review of Jason Ruff's email attaching comments and | |

JONES, ALEX

February 15, 2023

Account No: 5481-002000M

Statement No: 922213

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|---|-------|
| | | | | request on J&O and D&G retention applications (.2); emails to co-counsel to coordinate response and not duplicate efforts (.2). | 0.40 |
| | SAJ | B160 | A103 | Work on supplemental declaration in disclosures as needed regarding transactions, assets and work for affiliates. | 0.60 |
| | SAJ | B190 | A107 | Email to Battaglia (.1); co-counsel regarding status of parties to the mediation and schedule for mediator to contact all parties and form of mediation order (.2). | 0.30 |
| | SAJ | B190 | A104 | Review/analyze and comment on Brauner (.2); summarize mediator's concern about "documents" timing before sending mediation letter (.2). | 0.40 |
| 01/06/2023 | SAJ | B210 | A106 | Email to debtor regarding return to office and meeting to discuss status of all pending matters. | 0.30 |
| | SAJ | B160 | A107 | Email and telephone conference with co-counsel and access to the documents for Missouri Trust funding and related cash use for retainer and work on locating documents. | 1.70 |
| | SAJ | B160 | A109 | Appear for/attend hearings on Kyung and Schwartz. | 0.50 |
| 01/09/2023 | SAJ | B110 | A106 | Call to client regarding reimbursements of out of pocket connecticut expenses and status per co-counsel. | 0.30 |
| | SAJ | B110 | A104 | Review/analyze and comment on Utility Order. | 0.20 |
| | SAJ | B120 | A106 | Emails and call to debtor (.1); email to co-counsel regarding location of motorhome and security bank lien claim (.1); call to David Jones regarding payment (2). | 0.40 |
| | SAJ | B160 | A103 | Review and comment on proposed edits to order on interim fees. | 0.30 |
| 01/10/2023 | SAJ | B160 | A104 | Review and comment on first supplemental declaration for employment of J&O (.3); review C&D supplement and issues with payment of fees from retainer first (.1). | 0.40 |
| | SAJ | B250 | A104 | Review/analyze quitclaim circulation on trust assets returned to estate and work on title issue. | 0.40 |
| 01/11/2023 | CRM | B160 | A103 | Prepare draft of first interim fee application. | 1.50 |
| | SAJ | B150 | A109 | Attend 341 meeting by phone. | 0.60 |
| | SAJ | B150 | A106 | Call to debtor regarding meeting. | 0.20 |
| | SAJ | B120 | A107 | Email to co-counsel regarding motorhome loan paid off and response that debtor began payments (remaining issue-sell motorhome). | 0.30 |

JONES, ALEX

February 15, 2023

Account No: 5481-002000M

Statement No: 922213

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|--|-------|
| | SAJ | B190 | A107 | Review and respond to inquiries by Judge Isgur (mediator) for detailed financial information and expectation of completion (.2); email to co-counsel and review and respond and conference with Ray Battaglia regarding FSS response (.2). | 0.40 |
| | SAJ | B310 | A103 | Work on outline of claims objections to the Texas and Conn claims to be filed, including issues raised in appeals and issue of dischargeability. | 1.40 |
| 01/12/2023 | SAJ | B130 | A107 | Conference with co-counsel regarding location of state bank of crawford collateral and listing for sale. | 0.20 |
| | SAJ | B160 | A104 | Review/analyze and comment for filing supplement declaration. | 0.20 |
| | SAJ | B160 | A107 | Email and conference with co-counsel regarding Pattis and Reynal applications and retainer deposits paid. | 0.30 |
| 01/13/2023 | SAJ | B110 | A109 | Plan and attend hearing on motion to reconsider by S&L and Schwartz on FSS and objections filed by Alex Jones. | 1.00 |
| | SAJ | B160 | A107 | Conference with Reynal regarding appeal applicant to represent debtor, Alex Jones (.2); conference regarding entry of order starting appeal time (.1); email to Chris Martin regarding handling Alex Jones appeal (.1). | 0.40 |
| | SAJ | B160 | A107 | Emails to and from co-counsel regarding review and edit Supplement to J&O Application to be employed and declaration. | 0.30 |
| | SAJ | B190 | A107 | Review Rule 2004 Exam to PQPR by Plaintiffs; call to PQPR counsel; email from and to co-counsel. | 0.70 |
| | SAJ | B190 | A108 | Email to and from Judge Isgur regarding mediation and availability of financial documents and discussion with co-counsel. | 0.30 |
| 01/15/2023 | SAJ | B210 | A106 | Conference with debtor regarding status and issues to discuss. | 0.20 |
| 01/16/2023 | CRM | B160 | A103 | Continue to work on first interim fee application. | 0.90 |
| | SAJ | B160 | A107 | Conference with Andino Reynal (.2); conference with Chris Martin (.2); conference with Norm Pattis (.2); email to co-counsel regarding retention agreements for Jones estate with each and status and email from co-counsel review and respond (.1). | 0.70 |
| | SAJ | B130 | A108 | Email from Bob Schleizer regarding Missouri Trust and prepaid alimony for 2023 and pull notes to verify. | 0.20 |
| | SAJ | B130 | A107 | Email from and to co-counsel regarding alimony vs prenuptial. | 0.40 |

JONES, ALEX

February 15, 2023

Account No: 5481-002000M
Statement No: 922213

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|---|-------|
| 01/17/2023 | SAJ | B110 | A104 | Review/analyze email 2019 from creditors committee. | 0.20 |
| | SAJ | B110 | A107 | Conference with co-counsel on all pending matters including schedules and research for Missouri Trust and for certain repayments, etc. | 0.70 |
| | SAJ | B160 | A108 | Review and comment on UST comments to the Blackbriar and Kennerly employment applications. | 0.30 |
| 01/18/2023 | SAJ | B110 | A107 | Email from Ray Battaglia regarding cash collateral (.1); call regarding salary and cash collateral budget (.2); review witness and exhibit list (.2). | 0.50 |
| | SAJ | B160 | A107 | Email from Chris Martin and reply (.1); email from Andino Reynal and reply regarding appeal retention (.1); call to Reynal (.2); conference with co-counsel regarding retention and review new list of potential affiliate or related parties conflicts and report none (.3); review Sub-V trustee witness and exhibit list (.1). | 0.80 |
| | SAJ | B170 | A104 | Review/analyze exhibit and witness lists from Lee and Schwartz and compare to objections by Jones to both (.2); review Sandy Hook Plaintiffs, UST and Debtor's Exhibits and Witness List (.2); prepare for hearing (.4) | 0.80 |
| | SAJ | B185 | A104 | Review proposed draft order on executory contracts and comment (.2); review witness and exhibit list for Friday hearing on both executory contract (.2). | 0.40 |
| 01/19/2023 | SAJ | B185 | A104 | Review/analyze amended witness and exhibit lists by Lee and Schwartz. | 0.30 |
| 01/20/2023 | CRM | B160 | A109 | Appear for/attend 1/20 hearings | 1.50 |
| | CRM | B160 | A103 | Revise first fee app in response to interim compensation order and email same. | 1.50 |
| | SAJ | B160 | A109 | Attend hearing on J&O's Application to be employed and conference with co-counsel. | 1.00 |
| | SAJ | B170 | A109 | Attend hearing on Lee and Schwartz motions to reconsider on the objections of Alex Jones and others. | 1.20 |
| 01/21/2023 | SAJ | B210 | A106 | Conference with debtor regarding summary of FSS CRO issues. | 0.70 |
| 01/22/2023 | SAJ | B110 | A106 | Conference with client regarding administrative issues and problems with FSS and issues of the administrative claims this estate has with FSS and CRO and other matters (.5); emails to co-counsel for a Monday zoom or conference call with debtor (.5). | 1.00 |

February 15, 2023

Account No: 5481-002000M

Statement No: 922213

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|---|-------|
| 01/23/2023 | SAJ | B110 | A108 | Response to Bloomberg call and request for statements, no statement and refer to co-counsel. | 0.20 |
| | SAJ | B110 | A107 | Emails to co-counsel regarding first MOR and meeting with debtor and timing. | 0.30 |
| | SAJ | B160 | A103 | Work on first monthly fee statement pursuant to Court's Interim Fee Order, including Exhibit A. | 0.80 |
| | SAJ | B160 | A107 | Conference with Andino Reynal and Chris Martin regarding Jones estate appeal lawyer fee agreements (.4); email to co-counsel (.1). | 0.50 |
| 01/24/2023 | SAJ | B210 | A106 | Notice of debtor's interview and claim by Plaintiffs regarding new cause of action and new claim to damages and conference with debtor. | 1.40 |
| | SAJ | B210 | A107 | Review full details of interview and demand (.6); telephone conference with Andino Reynal and status of record references made in interview (.4). | 1.00 |
| | SAJ | B210 | A107 | Emails to co-counsel regarding potential issues raised by email demand. | 0.20 |
| | SAJ | B210 | A106 | Second conference with debtor about pulled video footage and confirmation. | 0.40 |
| | SAJ | B160 | A107 | Continue issue of fee agreements for Jones appeal (Chris Martin counsel) (.2); conference with Chris Martin and Andino Reynal (.4). | 0.60 |
| 01/25/2023 | SAJ | B110 | A104 | Review details of first MOR by debtor and email to co-counsel. | 0.30 |
| | SAJ | B110 | A106 | Conference with client regarding MOR and delivery of native format draw spreadsheets and agree no need to attend Thursday meeting. | 0.40 |
| | SAJ | B210 | A104 | Review and comment on issues of failure of McGill to produce projections for sales, expenses in email from co-counsel. | 0.30 |
| | SAJ | B210 | A107 | Conference with Battaglia and email regarding draws of Alex Jones accounting. | 0.30 |
| | SAJ | B160 | A107 | Call and email from Andino Reynal as appeal counsel in Texas cases and email to co-counsel regarding same. | 0.30 |
| | SAJ | B160 | A104 | Review drafts of retention agreements for Reynal and Martin. | 0.30 |
| | SAJ | B160 | A107 | Email and call to client regarding signature on Martin retention agreement. | 0.20 |
| | SAJ | B160 | A107 | Email to co-counsel regarding conversation with Chris Martin to | |

JONES, ALEX

February 15, 2023

Account No: 5481-002000M

Statement No: 922213

Bankruptcy

| | | | | | Hours | | |
|------------|-----|------|------|--|-------|--|-----------|
| | | | | assure proper accounting of \$100k retainer to Martin's firm from only Alex Jones (and not FSS). | 0.40 | | |
| | SAJ | B190 | A107 | Email from Battaglia regarding discovery and documents and discovery issues. | 0.20 | | |
| | SAJ | B190 | A107 | Email to and from co-counsel and discuss prior mediation privileged documents to Sub-V trustee. | 0.20 | | |
| 01/26/2023 | CRM | B160 | A103 | Final review and revisions to First Monthly Fee Statement from Shelby Jordan and file same and email to all notice parties. | 0.50 | | |
| | SAJ | B190 | A107 | Review PQPR discovery issues and privileged documents of FSS or Jones and conference with Lemmon and agree production must include mediation privilege marking. | 0.50 | | |
| | SAJ | B190 | A107 | Email to co-counsel regarding marking mediation privilege for production and respond to issues of production by co-counsel. | 0.20 | | |
| 01/27/2023 | SAJ | B210 | A107 | Emails to and from co-counsel regarding meeting on current topics. | 0.30 | | |
| | SAJ | B170 | A103 | Work on december fee statement and work on edits to notice of fees and motion for approval of interim fees. | 1.10 | | |
| 01/30/2023 | SAJ | B160 | A103 | Work on monthly fee application and breakdown on fee application for December 2022. | 2.00 | | |
| 01/31/2023 | CRM | B160 | A103 | Revise First Monthly Invoice per co-counsel email on bulk billing (.9); discuss with Shelby Jordan for his revisions (.1). | 1.00 | | |
| | SAJ | B190 | A104 | Review emails for production regarding committee and designate those that are privileged (sent from Lemmon's office) and pull and review all Shelby Jordan initiated emails. | 1.30 | | |
| | SAJ | B210 | A108 | Call to Rob Dew regarding representation of trust and assistance to handle tax, accounting and reporting issues for Litigation trust. | 0.40 | | |
| | SAJ | B210 | A107 | Discuss source of deposits for Info-W Health monthly royalties and need for turnover to trust the balance in trust account. | 0.30 | | |
| | | | | For Current Services Rendered | 50.90 | | 28,125.00 |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 44.00 | \$600.00 | \$26,400.00 |
| CRYSTAL MADDEN | Paralegals | 6.90 | 250.00 | 1,725.00 |

JONES, ALEX

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February 15, 2023

Account No: 5481-002000M
Statement No: 922213

Bankruptcy

| | | | | |
|------------|------|------|--------------------|--------------------|
| 01/31/2023 | B110 | E112 | Pacer | 102.50 |
| | | | Total Expenses | 102.50 |
| | | | Total Current Work | 28,227.50 |
| | | | Total Payments | -62,396.65 |
| | | | Balance Due | <u>\$43,700.00</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|------------------|-----------------|
| B110 | Case Administration | 3360.00 | 102.50 |
| B120 | Asset Analysis and Recovery | 1200.00 | 0.00 |
| B130 | Asset Disposition | 480.00 | 0.00 |
| B150 | Meetings of and Communications with Creditors | 480.00 | 0.00 |
| B160 | Fee/Employment Applications | 10125.00 | 0.00 |
| B170 | Fee/Employment Objections | 1860.00 | 0.00 |
| B185 | Assumption/Rejection of Leases and Contracts | 660.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 5220.00 | 0.00 |
| B100 | Administration | <u>23,385.00</u> | <u>102.50</u> |
| B210 | Business Operations | 3660.00 | 0.00 |
| B250 | Real Estate | 240.00 | 0.00 |
| B200 | Operations | <u>3,900.00</u> | <u>0.00</u> |
| B310 | Claims Administration and Objections | 840.00 | 0.00 |
| B300 | Claims and Plan | <u>840.00</u> | <u>0.00</u> |

Your trust account #1 balance is

| | | |
|------------|---|-------------------|
| 02/13/2023 | Opening Balance | \$146,790.16 |
| | Payment of December Fees (80% of fees and 100% of expenses) | <u>-62,396.65</u> |
| | Closing Balance | \$84,393.51 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 5.60 | |
| B120 Asset Analysis and Recovery | 2.00 | |
| B130 Asset Disposition | 0.80 | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | 0.80 | |
| B160 Fee/Employment Applications | 14.00 | 6.90 |
| B170 Fee/Employment Objections | 3.10 | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | 1.10 | |
| B190 Other Contested Matters | 8.70 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | 6.10 | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | 0.40 | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 1.40 | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | | |
| B420 Restructurings | | |
| TOTALS: | 44.00 | 6.90 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**THIRD MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023**

| | | |
|---|------------------------------|--|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 02/01/2023 | 02/28/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | | \$40,964.00 ¹ (80% of \$51,205.00) |
| Total Reimbursable Expenses Requested in this Statement: | | \$22.44 ² |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | | \$50,580.00 |
| Total Actual Attorneys Hours Covered by this Statement: | | 84.30 |
| Average Hourly Rate for Attorneys: | | \$600.00 |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | | \$625.00 |
| Total Actual Paraprofessional Hours Covered by this Statement: | | 2.50 |
| Average Hourly Rate for Paraprofessionals: | | \$250.00 |

¹ Counsel is holding \$61,791.01 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") second monthly fee statement for compensation (the "Fee Statement") for the period of February 1, 2023 through February 28, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$40,964.00 (80% of \$51,205.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$22.44 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period February 1, 2023 through February 28, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested.

Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained

Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$40,964.00 (80% of fees in the amount of \$51,205.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$22.44 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$40,986.44 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: March 13, 2023

/s/ Shelby A. Jordan
SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
State Bar No. 24074839
S.D. No. 1127322
Jordan & Ortiz, P.C.
500 North Shoreline Blvd., Suite 900
Corpus Christi, TX 78401
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on March 13, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

JORDAN & ORTIZ, P.C. FEBRUARY INVOICE FOR PERIOD FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023

SUMMARY OF PREVIOUS UNPAID INVOICES

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Amount Billed</u> | <u>Credits Applied</u> | <u>Balance Due</u> |
|--------------------|-------------------------|---------------------|--------------------------|----------------------------|--------------------|
| 922199 | December | 1/27/23 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| TOTALS | | | \$106,096.65 | -\$84,999.15 | \$21,097.50 |

JORDAN A. ORTIZ, P.C.
 500 N. SHORELINE BLVD, SUITE 900
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 March 02, 2023
 Account No: 5481-002000M
 Statement No: 922268

Bankruptcy

PREVIOUS BALANCE

\$43,700.00

Hours

| | | | | | |
|------------|-----|------|------|---|------|
| 02/01/2023 | CRM | B160 | A103 | Revise exhibit A to first monthly fee statement to show time spent broken down and email amended exhibit A to co-counsel. | 1.10 |
| | SAJ | B160 | A107 | Call from and copy of fee agreement from Andino Reynal. | 0.30 |
| | SAJ | B170 | A103 | Work on edits to December fee statement and amendments. | 0.70 |
| | SAJ | B170 | A104 | Review form and content of Battaglia fee statement. | 0.30 |
| | SAJ | B190 | A104 | Review/analyze and comment on confidentiality order and copy co-counsel. | 0.40 |
| 02/02/2023 | CRM | B160 | A103 | Additional edits to first monthly statement and december invoice based on change to AO time entry (.5); email to Shelby Jordan and co-counsel with changes to same. (.1). | 0.60 |
| | SAJ | B210 | A108 | Receive and forward to financial consultant the Guadalupe County Tax office notice of address for ranch property for schedules and to change to debtor. | 0.20 |
| | SAJ | B160 | A106 | Email and call regarding Jones signature on Reynal fee agreement and email and call to client to arrange. | 0.40 |
| | SAJ | B170 | A104 | Review/analyze Reynal billings and comment on two-way travel billings and hourly rate. | 0.30 |
| | SAJ | B190 | A107 | Review and respond to Moshenberg email regarding sharing all discovery from the state court litigation and conference with Battaglia and co-counsel on protective order and opposition to disclosures without agreed protective order and review two additional drafts. | 0.80 |
| | SAJ | B190 | A103 | Review and begin comments on Reynal's email summary of response to demand for retraction and telephone conference with Reynal and debtor on how to further respond. | 0.80 |

Bankruptcy

Hours

| | | | | | |
|------------|-----|------|------|---|------|
| | SAJ | B190 | A107 | Review and forward to co-counsel issues with Moshenberg summary of clawback issues after review of attachments. | 0.60 |
| 02/03/2023 | SAJ | B160 | A103 | Finish and circulate amended December fee statement with further breakdown of codes. | 0.60 |
| | SAJ | B160 | A104 | Review/analyze reynal edited fee agreement and discuss with debtor regarding hourly rate. | 0.30 |
| | SAJ | B190 | A104 | Review emails and draft of new version of protective order. | 0.30 |
| 02/05/2023 | SAJ | B210 | A106 | Call and email to client regarding status of matters and request for in person meeting. | 0.30 |
| | SAJ | B190 | A107 | Email to co-counsel regarding status of issues and suggestion for an "all hand" conference call with Bob regarding FSS and mediation. | 0.20 |
| 02/06/2023 | SAJ | B210 | A106 | In office meeting with debtor and review status of all operations and all outstanding operating issues. | 0.90 |
| | SAJ | B210 | A107 | Email to co-counsel for an "all hands" meeting for joint status update. | 0.10 |
| | SAJ | B210 | A106 | Telephone conference with client and Rob Dew regarding status of settlement trust and potential adoption of Alex Jones issues and Plan. | 0.80 |
| | SAJ | B210 | A108 | Telephone call regarding litigation settlement trust and status of assets and scheduling of potential or actual interest in LST assets and need to update all SOS filings including reports for franchise reports and conference regarding getting CPA for LST to prepare the reports and accounting. | 0.80 |
| 02/07/2023 | SAJ | B110 | A106 | Conference with debtor regarding DIP operations to answer questions and issues of debtor regarding personnel and handling. | 0.70 |
| | SAJ | B110 | A107 | Conference with co-counsel on status of schedules and statements and status of issues raised by debtor in operations and completion of schedules and call to debtor for update after co-counsel call. | 1.00 |
| | SAJ | B110 | A107 | Review FSS response to Ponzer Lift Stay and conference with co-counsel regarding motion for relief from stay by Ponzer and DeLaRosa and Alex Jones response additions. | 0.60 |
| | SAJ | B190 | A107 | Conference call with co-counsel and Judge Isgur regarding status of schedules, disclosures and mediation and pull both Texas Judgement and Connecticut Judgement for memo to debtor and co-counsel on dischargeability (adapt for mediation | |

Bankruptcy

statement). Hours
1.00

| | | | | | | |
|------------|-----|------|------|---|------|-----|
| 02/08/2023 | SAJ | B210 | A103 | Begin draft on right to indemnity both contractual and statutory for FSS Administrative claim by Alex Jones for unpaid post-petition salary, advances of funds, Conn travel and lodging expenses and employment agreement. | 1.60 | |
| | SAJ | B120 | A106 | Call to debtor regarding schedules and statements and completion of asset listing and conference regarding "opportunity" analysis if value is involved and disclosures. | 0.60 | |
| | SAJ | B130 | A106 | Conference with client and CRO regarding helicopter privileges. | 0.30 | |
| | SAJ | B190 | A103 | Work on memo to co-counsel regarding Heslin (TX) and Lafferty (Conn) judgments and evaluation of appellate grounds (also dischargeability grounds) including trial and submission defects that prevent res judicata, collateral estoppel, issue preclusions etc. | 2.10 | |
| 02/09/2023 | SAJ | B160 | A103 | Review, edit and approve certificate of no objection. | 0.30 | |
| | SAJ | B180 | A103 | Work on attorneys fees claim for sanction payment and prepare memo on Supreme Court guidance on hourly billing regarding Bankston failure to keep time records (payment funded by debtor) and state court \$1 million dollar payment funded by debtor Alex Jones. | 2.80 | |
| | SAJ | B190 | A104 | Review final draft of confidentiality agreement. | 0.60 | n/c |
| | SAJ | B190 | A108 | Mediation meeting with co-counsel and Judge Isgur. | 0.40 | |
| | SAJ | B190 | A106 | Work on modified transcript and meet at debtors office to begin to pull and review videos for retraction. | 2.30 | |
| | SAJ | B190 | A104 | Review/analyze all parties exhibit and witness list and pull documents important to debtor. | 0.40 | |
| 02/10/2023 | SAJ | B210 | A106 | Call and conference with debtor regarding give-send-go account administered by Norm Pattis and need for an accounting. | 0.40 | |
| | SAJ | B210 | A104 | Concerns about collection of Youngevity monthly payments and reasons for stop payments and advancement of trust account funds and gather information for co-counsel to schedule and to contact Youngevity CEO or its counsel. | 0.50 | |
| | SAJ | B140 | A107 | Review and respond to co-counsel regarding hearing on lift stay as only preliminary and review exhibit and witness list. | 0.20 | |
| | SAJ | B190 | A106 | Work with debtor and Rob Dew on first full transcript and full videos for response to demand for retraction by Lewis and | | |

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|---|-------|
| | | | | recommend viewing all videos from both cameras. | 3.80 |
| | SAJ | B190 | A107 | Review final confidentiality agreement with PQPR removed and email to co-counsel.) | 0.30 |
| 02/12/2023 | SAJ | B210 | A106 | Call from debtor and forwarding copies of notes from Reynal regarding response to Bankston Demand letter for retraction. | 1.50 |
| | SAJ | B210 | A103 | Begin additional research on how to respond to denial of conversation and how to deal with demand for retraction of non-slanderous statements and prepare initial memo to support outline of details of the proposed written response (and all video response) and circulate V1 and V2 of written response. | 2.80 |
| 02/13/2023 | SAJ | B210 | A107 | Meeting with co-counsel in debtor's office regarding work on final input to schedules and statements and verify trust account balances and status of issues regarding the 2022 settlement trust termination, winding down and sale of assets. | 1.30 |
| | SAJ | B160 | A103 | Work on January billing statements request and hold back. | 0.30 |
| | SAJ | B170 | A106 | Conference with debtor regarding \$800.00 per hour for litigation and other issues with litigation issues. | 0.20 |
| | SAJ | B170 | A107 | Emails to co-counsel on total fees issues and costs of appeal. | 0.20 |
| | SAJ | B210 | A106 | Meeting with debtor in office regarding download of sequence of events to be reflected in video and video clips from trial and on air. | 2.00 |
| | SAJ | B210 | A108 | Meeting with Rob Dew to begin review of all video clips and to add video clips of second day testimony and work on video cuts and additions and work on titles of each clip at debtor's offices with Rob Dew. | 2.60 |
| | SAJ | B210 | A103 | Work on and circulate V3 and V4 of written response and add additional research. | 2.50 |
| | SAJ | B210 | A108 | Conference with Ben Brooks regarding how to respond to demand of non slanderous statement. | 0.50 |
| | SAJ | B210 | A104 | Obtain copy of complete Piers Morgan interview and view. | 1.00 |
| | SAJ | B210 | A107 | Emails to and from Reynal regarding scope of Bankston's publication of non-clawed back production and HIPPA information. | 0.30 |
| | SAJ | B210 | A104 | Review/analyze witness and exhibit lists for February 14th hearings. | 0.20 |
| | SAJ | B210 | A107 | Review and discuss with co-counsel email from Lemmon on behalf of PQPR production of documents. | 0.30 |

Bankruptcy

Hours

| | | | | | |
|------------|-----|------|------|---|------|
| 02/14/2023 | CRM | B160 | A103 | Prepare second monthly fee notice and send to Shelby for approval before filing. | 0.60 |
| | SAJ | B110 | A107 | Meeting with co-counsel at debtor's office and review final (initial) schedules and statements and edits. | 1.10 |
| | SAJ | B210 | A107 | Conference with Vicki Driver regarding 2022 settlement litigation trust and ownership of its three entities Info-W, Info-Health and Prison Planet TV and review trust documents regarding memo for current treatment of entities. | 1.30 |
| | SAJ | B210 | A108 | Conference with Richard Dale CPA regarding discussing background of trust and assuring all entities of litigation settlement trust have all SOS reports filed or updated for "good standing" certificates and reporting deficiencies and discuss terms of terms of retention and request for retainer. | 0.70 |
| | SAJ | B190 | A106 | Meeting with debtor in his office regarding work on V5 of written response to Bankston demand letter for retraction of Piers Morgan interview statements and conference with Rob Dew to make additions and edits to video sequence, copy V4 to co-counsel including Reynal and request input and edits. | 4.00 |
| 02/15/2023 | CRM | B160 | A103 | File Second Monthly Fee Statement for January and serve same. | 0.20 |
| | SAJ | B190 | A106 | Telephone conference with debtor and Ray Battaglia regarding Bankston's filing of the text messages of Alex in state court as a violation of the automatic stay to collect a debt. | 1.10 |
| | SAJ | B190 | A107 | Email to Andino Reynal and co-counsel regarding this topic and contents of debtor and Battaglia conversation and pull case law regarding disclosure of non-relevant personal information of a litigant. | 1.30 |
| | SAJ | B190 | A103 | Finish debtor's reply to Bankston's slander demand letter and view video response and conference with Rob Dew and debtor of video issues, meeting in Debtor's office for conference and viewing. | 2.60 |
| | SAJ | B320 | A107 | Conference with Battaglia regarding terms of plan of FSS and dependency on Jones for feasibility and request and review copy of plan with Debtor. | 1.30 |
| 02/16/2023 | SAJ | B110 | A104 | Review/analyze and comment regarding production of emails and issues of privilege and notice of joint defense privilege preservation to co-counsel. | 0.40 |
| | SAJ | B110 | A107 | Review and forward to co-counsel multiple press requests for information concerning schedules and statements. | 0.40 |

Bankruptcy

Account No:
Statement No:5481-002000M
922268

| | | | | Hours | |
|------------|-----|------|------|---|----------|
| | SAJ | B110 | A106 | Receive and forward MOR to client and review MOR with debtor. | 0.50 |
| | SAJ | B210 | A107 | Review motion to revoke FSS status as a subchapter V case and conference with Battaglia. | 1.00 n/c |
| | SAJ | B120 | A104 | Review issues raised by co-counsel for further development in schedule amendments and begin work on trust disclosures. | 0.60 |
| | SAJ | B120 | A107 | Call to Eric Taube regarding work on by estate lawyer that stopped practice. | 0.30 |
| | SAJ | B190 | A107 | Attend zoom meeting with FSS Battaglia and co-counsel regarding mediation and conference with mediator. | 0.80 |
| | SAJ | B190 | A103 | Work on "on air" script and video for retraction demand and call and conference with Rob Dew on edits. | 1.60 |
| | SAJ | B190 | A107 | Call to Reynal and review designation of record on appeal. | 0.30 |
| 02/17/2023 | SAJ | B190 | A104 | Received and reviewed current version of retraction video. | 2.00 |
| | SAJ | B190 | A107 | Forward web access of retraction video to Reynal and co-counsel for review and comment. | 0.30 |
| | SAJ | B190 | A106 | Trip to debtor offices and view new edits to retraction video and conference with client and Rob Dew. | 1.00 |
| 02/18/2023 | SAJ | B190 | A106 | Email and call to Rob Dew regarding addition of statement to clarification/retraction video and call to debtor. | 0.70 |
| | SAJ | B190 | A104 | Review/analyze addition and approve statement for clarification and retraction video. | 0.70 |
| 02/20/2023 | SAJ | B190 | A108 | Call and conversation with Rob Dew regarding edits and final changes to retraction demand video and approve and agree to publish. | 0.80 |
| 02/21/2023 | SAJ | B110 | A107 | Conference with Norm Pattis regarding accounting corrections for "give-send-go" donation account and post petition transfer from account to IOLTA of Pattis and email to counsel. | 0.40 |
| | SAJ | B210 | A106 | Review lengthy email collection forwarded by debtor's ex-wife and discuss with debtor and co-counsel to determine not to respond. | 0.50 |
| | SAJ | B190 | A103 | Work on final draft of video edits and emails and call to editing crew. | 2.50 |
| | SAJ | B190 | A106 | Call to debtor and circulate final draft to all debtor counsel for review and serve final draft of notice of retraction to Bankston. | 0.50 |

Bankruptcy

Account No:
Statement No:5481-002000M
922268

| | | | | | Hours | |
|------------|-----|------|------|---|-------|-----|
| | SAJ | B190 | A108 | Prepare and attend conference call with mediator Isgur and all debtor related counsel. | 0.80 | |
| 02/22/2023 | SAJ | B110 | A104 | Review and comment on motion to strike sub chapter V designation in FSS chapter 11. | 0.40 | |
| | SAJ | B190 | A108 | Follow up with obtaining all locations of retraction and a copy of the full show including retraction and call to Rob Dew. | 0.40 | |
| 02/23/2023 | SAJ | B110 | A104 | Review summary of amendment to schedules and statement topics and comment and review communication to mediator regarding same. | 0.70 | |
| | SAJ | B210 | A109 | Attend partial 341 meeting and UST questioning and email to co-counsel. | 1.00 | |
| | SAJ | B410 | A106 | Call from client and discuss 341 meeting and issues. | 0.40 | |
| 02/24/2023 | SAJ | B110 | A108 | Coordinate Judge Nelms and Judge Schmidt advances and 1099 to include their 1099 to Matt Okin. | 0.20 | n/c |
| | SAJ | B110 | A104 | Verify that final retraction was published an no response yet from Piers Morgan for show publication and verify receipt by Bankston (no response to date). | 0.60 | |
| | SAJ | B160 | A104 | Review all witness and exhibit lists for hearing to determine exhibits (none) and objections (none). | 0.30 | |
| | SAJ | B190 | A107 | Receive and review 2004 exam of Alex Jones and email to co-counsel. | 0.30 | |
| 02/26/2023 | SAJ | B210 | A106 | Call from debtor regarding operations. | 0.20 | |
| | SAJ | B210 | A106 | Call to debtor operations and 341 meeting. | 0.30 | |
| | SAJ | B210 | A107 | Call to co-counsel and leave message. | 0.10 | |
| 02/27/2023 | SAJ | B210 | A106 | Call to co-counsel and call to client regarding status and discussion with co-counsel regarding 341 meeting and debtor's responses and matters to be done post 341. | 0.40 | |
| | SAJ | B190 | A103 | Work on discharge issues of Connecticut claims and update memo. | 2.00 | |
| 02/28/2023 | SAJ | B110 | A109 | Attend hearing on appeal lawyers retention application (Reynal and Martin). | 0.40 | |
| | SAJ | B110 | A107 | Call and conference with co-counsel regarding status of all pending matters. | 0.30 | |
| | SAJ | B110 | A106 | Call to debtor for scheduling. | 0.20 | |

March 02, 2023

Bankruptcy

Account No:
Statement No:5481-002000M
922268

| | | | | | |
|-----|------|------|---|-------|-----------|
| SAJ | B210 | A108 | Conference with Rob Dew and co-counsel regarding how to determine the status of the 2022 litigation trust now in winding down phase with remaining debt in InfoW (not related to the waived debt of Sandy Hook Plaintiffs) and working on memo summary. | Hours | |
| | | | | 1.70 | |
| SAJ | B190 | A103 | Work on memo on Connecticut and Texas discharge of debts to supplement mediation statement and email to co-counsel. | 2.00 | |
| | | | For Current Services Rendered | 86.80 | 51,205.00 |
| | | | Total Non-billable Hours | 1.80 | |

| | | | | |
|-------------------|-----------------------|--------------|-------------|--------------|
| <u>Timekeeper</u> | <u>Recapitulation</u> | | | |
| SHELBY A. JORDAN | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| CHRYSTAL MADDEN | Partners | 84.30 | \$600.00 | \$50,580.00 |
| | Paralegals | 2.50 | 250.00 | 625.00 |

| | | | | |
|------------|------|------|-------------------------|-------------|
| 02/28/2023 | B110 | E106 | Online research - Lexis | |
| 02/28/2023 | B110 | E106 | Online research - PACER | 2.04 |
| | | | Total Expenses | 20.40 |
| | | | | 22.44 |
| | | | Total Current Work | 51,227.44 |
| | | | Total Payments | -22,602.50 |
| | | | Balance Due | \$72,324.94 |

Task Code Summary

| | <u>Fees</u> | <u>Expenses</u> |
|---|-------------|-----------------|
| 3110 Case Administration | | |
| 3120 Asset Analysis and Recovery | 4620.00 | 22.44 |
| 3130 Asset Disposition | 900.00 | 0.00 |
| 3140 Relief from Stay/Adequate Protection Proceedings | 180.00 | 0.00 |
| 3160 Fee/Employment Applications | 120.00 | 0.00 |
| 3170 Fee/Employment Objections | 2125.00 | 0.00 |
| 3180 Avoidance Action Analysis | 1020.00 | 0.00 |
| 3190 Other Contested Matters (excluding assumption/rejection motions) | 1680.00 | 0.00 |
| 100 Administration | 23460.00 | 0.00 |
| | 34,105.00 | 22.44 |
| 210 Business Operations | | |
| 200 Operations | 16080.00 | 0.00 |
| | 16,080.00 | 0.00 |
| 320 Plan and Disclosure Statement (including Business Plan) | | |
| 300 Claims and Plan | 780.00 | 0.00 |
| | 780.00 | 0.00 |
| 410 General Bankruptcy Advice/Opinions | 240.00 | 0.00 |

JONES, ALEX

March 02, 2023

Account No: 5481-002000M
Statement No: 922268

Bankruptcy

| | | <u>Fees</u> | <u>Expenses</u> |
|------|---------------------------|-------------|-----------------|
| B400 | Bankruptcy-Related Advice | 240.00 | 0.00 |

Your trust account #1 balance is

| | |
|--|--------------|
| Opening Balance | \$84,393.51 |
| 3/10/23 Payment of January Fees (80% of fees and 100% of expenses) | -\$22,602.50 |
| Closing Balance | \$61,791.01 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 7.7 | |
| B120 Asset Analysis and Recovery | 1.5 | |
| B130 Asset Disposition | 0.30 | |
| B140 Relief from Stay/Adequate Protection | 0.20 | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | 2.5 | 2.5 |
| B170 Fee/Employment Objections | 1.7 | |
| B180 Avoidance Action Analysis | 2.80 | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 39.1 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | 26.8 | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | | |
| B320 Plan and Disclosure Statement | 1.30 | |
| B410 General Bankruptcy Advice/Opinions | 0.40 | |
| B420 Restructurings | | |
| TOTALS: | 84.30 | 2.5 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**FOURTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
MARCH 1, 2023 THROUGH MARCH 31, 2023**

| | | |
|---|------------------------------|--|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 03/01/2023 | 03/31/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | | \$37,456.00 ¹ (80% of \$46,820.00) |
| Total Reimbursable Expenses Requested in this Statement: | | \$120.30 ² |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | | \$45,895.00 |
| Total Actual Attorneys Hours Covered by this Statement: | | 76.70 |
| Average Hourly Rate for Attorneys: | | \$598.37 |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | | \$925.00 |
| Total Actual Paraprofessional Hours Covered by this Statement: | | 3.70 |
| Average Hourly Rate for Paraprofessionals: | | \$250.00 |

¹ Counsel is holding \$20,804.57 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") fourth monthly fee statement for compensation (the "Fee Statement") for the period of March 1, 2023 through March 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$37,456.00 (80% of \$46,820.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$120.30 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period March 1, 2023 through March 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained

Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$37,456.00 (80% of fees in the amount of \$46,820.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$120.30 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$37,576.30 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: April 26, 2023

/s/ Shelby A. Jordan
SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
State Bar No. 24074839
S.D. No. 1127322
Jordan & Ortiz, P.C.
500 North Shoreline Blvd., Suite 900
Corpus Christi, TX 78401
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on April 26, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

JORDAN & ORTIZ, P.C. MARCH INVOICE FOR PERIOD MARCH 1, 2023 THROUGH MARCH 31, 2023

SUMMARY OF PREVIOUS UNPAID INVOICES

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Amount Billed</u> | <u>Credits Applied</u> | <u>Remaining Balance Due</u> |
|---------------------------|--------------------------------|----------------------------|---------------------------------|-----------------------------------|---|
| 922199 | December | 1/27/23 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| TOTALS | | | \$157,324.09 | -\$125,985.59 | \$31,338.50 |

JORDAN & ORTIZ, P.C.
 500 N. SHORELINE BLVD, SUITE 900
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 April 06, 2023
 Account No: 5481-002000M
 Statement No: 922376

Bankruptcy

PREVIOUS BALANCE

\$72,324.94

Hours

| | | | | | |
|------------|-----|------|------|--|------|
| 03/01/2023 | SAJ | B210 | A103 | Review financial statements of FSS from August 1, 2022 to January 31, 2023 and prepare memo. | 0.80 |
| | SAJ | B210 | A106 | Call to debtor and conference regarding FSS financial statements. | 0.20 |
| | SAJ | B210 | A107 | Email and respond to co-counsel regarding communication with Jones and status of his response. | 0.20 |
| | SAJ | B190 | A103 | Work on memo regarding dischargeability of Texas and Conn Plaintiffs and circulate drafts to debtor and co-counsel. | 2.80 |
| 03/02/2023 | SAJ | B110 | A108 | Follow up on note for Guadalupe Tax office notice of recording of quitclaim deed and need to change of address to debtor. | 0.20 |
| | SAJ | B120 | A108 | Receive and begin review of email from Richard Reeves sending per my request relevant documents, including emails, January 13 notice of cancellation of membership status and other related documents. | 1.00 |
| | SAJ | B120 | A108 | Call to Reeves for explanation and beginning chronology and how to find missing information. | 0.40 |
| | SAJ | B160 | A103 | Finish modification to Second Monthly Fee Statement to conform February filings. | 0.20 |
| | SAJ | B190 | A107 | Conference with Battaglia regarding Avi Moshenbourg threat to share or make public all documents produced by FSS in underlying state court case and response including response regarding new confidentiality order and publication subject thereto per co-counsel's email notice of intent to be bound and email response to Moshenbourg to notice. | 1.00 |
| | SAJ | B190 | A106 | Email to debtor regarding response to retraction and status of Piers Morgan agreement to air retraction. | 0.20 |

JONES, ALEX

April 06, 2023

Account No: 5481-002000M
Statement No: 922376

Bankruptcy

| | | | | | Hours | |
|------------|-----|------|------|--|-------|-----|
| | SAJ | B240 | A106 | Review with debtor new POC by IRS of \$558,984.64 and email to Bob Schleizer and co-counsel. | 0.30 | |
| | AO | B190 | A104 | Review memo circulated by Shelby Jordan regarding dischargeability and conference regarding same. | 1.00 | |
| 03/03/2023 | SAJ | B120 | A103 | Receive data dump from Reeves and begin drafting demand to Youngevity recovery of royalty payments and response to suspension letter and conference with Richard Reeves regarding documents and emails and chronology. | 2.20 | |
| | SAJ | B170 | A104 | Review/analyze for confidentiality the Appellee UST designations on appeal by Schwartz and Lee and compare to S&L Appellate designations. | 0.30 | |
| 03/04/2023 | SAJ | B120 | A103 | Work on documents for Youngevity claims review and prepare chronology. | 1.10 | |
| 03/05/2023 | SAJ | B120 | A103 | Work on documents for Youngevity claims including emails and email to Richard Reeves and conference with debtor. | 1.40 | |
| 03/06/2023 | CRM | B160 | A103 | Prepare draft of third monthly fee statement. | 0.70 | |
| | SAJ | B110 | A106 | Call from debtor regarding current operations and FSS financial statements (6 months P&L). | 0.70 | |
| | SAJ | B120 | A104 | Continue to review documents and email correspondence. | 1.30 | |
| | SAJ | B120 | A107 | Call to co-counsel and leave message. | 0.10 | n/c |
| | SAJ | B190 | A107 | Calls on De La Rosa lift stay. | 0.20 | n/c |
| | SAJ | B190 | A104 | Review exhibit lists of hearing on motion to compel for exhibits and expected witnesses. | 0.40 | |
| | SAJ | B190 | A103 | Work on details of research on discharge issue to add back to memo sent to co-counsel. | 0.60 | |
| | SAJ | B140 | A107 | Call to Martin, Reynal, co-counsel regarding unable to attend telephone conference set today and issues of additional trials. | 0.30 | |
| | SAJ | B140 | A106 | Call from debtor about lift stay and attendance on call. | 0.30 | |
| 03/07/2023 | SAJ | B110 | A104 | Receive and review UST's response to motion to revoke sub V status of FSS. | 0.40 | |
| | SAJ | B120 | A108 | Meeting and telephone call with Richard Reeves and review batched emails on issue of Youngevity and review background facts and financial status of Youngevity and research quarterly financial report. | 2.70 | |
| | SAJ | B120 | A106 | Meeting with debtor and co-counsel at debtors office and | | |

JONES, ALEX

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April 06, 2023

Account No: 5481-002000M

Statement No: 922376

Bankruptcy

| | | | | | Hours |
|------------|-----|------|---|---|-------|
| | | | meeting with David Jones on history, chronology and approach to recovery of distributions due debtor from Youngevity. | | 1.00 |
| | SAJ | B140 | A107 | Conference with co-counsel and Reynal regarding stay relief and intention to set trial date and issues of additional trial with Chris Martin. | 0.30 |
| | SAJ | B140 | A106 | Conference with debtor regarding conference with co-counsel and Reynal. | 0.20 |
| 03/08/2023 | SAJ | B210 | A109 | Prepare and attend hearing on motion to compel amendment to schedules. | 0.80 |
| | SAJ | B120 | A103 | Work on demand letter to Youngevity and look for any signed document and amendments. | 1.20 |
| | SAJ | B120 | A106 | Meeting with debtor regarding Youngevity. | 0.40 |
| | SAJ | B320 | A104 | Begin review of FSS Plan filed today and conference with Battaglia regarding Plan and issues of Sub V case designation and objections. | 1.00 |
| | SAJ | B320 | A104 | Review and send current published brief on issues of corporate discharge under 523. | 0.70 |
| 03/09/2023 | SAJ | B210 | A106 | Send debtor copy of FSS plan as requested and brief summary of questions of Sub Ch V. | 0.50 |
| | SAJ | B410 | A106 | Conference with Debtor regarding implications of January 6 evidence and issues regarding debtor. | 0.60 |
| | SAJ | B410 | A107 | Conference with Norm Pattis regarding January 6 evidence and status of debtor's risk of involvement. | 0.30 |
| | SAJ | B120 | A107 | Telephone conference with co-counsel regarding status of Youngevity (both financial and allegations of breach) and work on response and demand for payment. | 0.70 |
| | SAJ | B140 | A107 | Conference with co-counsel on status of stay relief and potential for another trial pre-mediation. | 0.30 |
| 03/10/2023 | SAJ | B160 | A107 | Email explanation to Reynal on fee applications and monthly hold back along with copy of Court's order. | 0.30 |
| | SAJ | B160 | A103 | Finish for circulation 3rd monthly fee statement. | 0.30 |
| | SAJ | B185 | A103 | Review draft of pleading and work on rejection of executory contract motion regarding elevated solutions two contracts. | 0.30 |
| | SAJ | B185 | A106 | Call to debtor and call and message to ESG. | 0.20 |
| | SAJ | B185 | A107 | Email to Bob. | 0.10 |

JONES, ALEX

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April 06, 2023

Account No: 5481-002000M
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Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|---|-------|
| | SAJ | B185 | A104 | Research contract granting right to represent celebrity and granting interest in the whisky celebrity contract and rejection. | 0.40 |
| | SAJ | B190 | A107 | Emails from and to Reynal regarding agreement with Ponzer defendants on lift stay and status of UCC and Sub V to verify. | 2.00 |
| | SAJ | B190 | A107 | Call to Battaglia regarding response to plaintiffs to revoke the Sub V election and review motion and response and discuss with debtor. | 0.60 |
| 03/13/2023 | CRM | B160 | A103 | Final review of third monthly fee statement and file and serve same. | 0.50 |
| | SAJ | B210 | A106 | Conference with debtor regarding status of notice to court of preliminary issues of conduct of Plaintiffs, status of mediation and upcoming hearings. | 0.40 |
| | SAJ | B160 | A103 | Work on application and Exhibit B of Norm Pattis and emails to co-counsel staff and work on fee agreement signed copies with Alex Jones and FSS. | 2.30 |
| | SAJ | B190 | A104 | Begin review and analysis of Texas and Connecticut Adversary to determine dischargeability of sandy hook plaintiffs claims. | 2.10 |
| 03/14/2023 | SAJ | B160 | A107 | Call to Pattis regarding edits and location of signed fee agreement with debtor Jones and terms of engagement. | 0.40 |
| | SAJ | B160 | A107 | Review Tenco Capital LLC comment and forward to co-counsel. | 0.20 |
| | SAJ | B190 | A104 | Continue to review and analysis of Texas and Connecticut Adversary to determine dischargeability of Sandy Hook Plaintiffs claims. | 1.20 |
| 03/16/2023 | CRM | B190 | A103 | Prepare notices of appearances in all new adversary matters and file same. | 0.50 |
| | SAJ | B185 | A103 | Review and begin edits to motion to reject ESG executory contracts, conference with debtor, call to Joey D and email to Bob. | 1.00 |
| | SAJ | B190 | A104 | Continue to review and comment on objection to dischargeability and conference with debtor regarding same. | 1.30 |
| 03/17/2023 | SAJ | B110 | A106 | Conference with client regarding McGill questions and issues and decision to reject executory contracts and issues raised by Plaintiff in removal of the Sub-V. | 0.40 |
| | SAJ | B185 | A107 | Emails from and to Bob S/Harold regarding rejection of executory contracts of ESG. | 0.20 |

JONES, ALEX

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April 06, 2023

Account No: 5481-002000M
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Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|--|-------|
| | SAJ | B185 | A106 | Email to client and email from co-counsel and telephone conference with ESG and debtor regarding rejection of executory contracts of ESG.. | 0.20 |
| | SAJ | B190 | A103 | Work on pleading summary and analysis regarding dischargeability. | 1.00 |
| | SAJ | B190 | A104 | Receipt and review and compare new 2004 exam to FSS and Alex Jones served by Freeman filed under seal and circulate. | 0.30 |
| | SAJ | B190 | A104 | Receipt and review notice of 2004 exam to ESG and forward and comment. | 0.20 |
| | SAJ | B190 | A106 | Conference with client regarding explanation of suits filed by Tex and NY and defenses and potential new trial. | 0.60 |
| 03/18/2023 | SAJ | B190 | A103 | Work on TX Plaintiffs objection to dischargeability pleading summary and discharge defense research issues. | 2.10 |
| 03/19/2023 | SAJ | B110 | A106 | Call from debtor regarding scheduling meeting with co-counsel and prepare list of issues and topics for conference. | 0.40 |
| 03/20/2023 | SAJ | B110 | A107 | Email to co-counsel with list of Jones questions and scheduling meeting on issues. | 0.20 |
| | SAJ | B210 | A105 | Conference with client regarding current strategy list of pending matters including EGS rejection of contracts and operations, nature of objections to discharge and how procedures work and appellate status. | 0.60 |
| 03/21/2023 | CRM | B120 | A107 | Email from co-counsel regarding current deed for Cedar Creek and pull land records to run search for same to locate and email to co-counsel. | 0.60 |
| | SAJ | B190 | A107 | Review co-counsel email regarding production of documents to UCC and basis of redaction or motion AEO. | 0.20 |
| | SAJ | B190 | A103 | Work on notes and outline to both TX and Conn Plaintiffs objection to dischargeability. | 1.10 |
| 03/22/2023 | SAJ | B190 | A106 | Call from Debtor regarding strategy issues list add Youngevity. | 0.30 |
| | SAJ | B190 | A107 | Call from Norm Pattis regarding debtor issues in Jan 6th subpoena possibility. | 0.20 |
| 03/24/2023 | SAJ | B210 | A106 | Call from debtor and create list of issues and topics debtor wants to have an "all hand" conference on and email to co-counsel regarding next Tuesday meeting. | 1.00 |
| | SAJ | B120 | A103 | Work on Youngevity demand letter to forward to debtor or names and email Harmon for CEO email or correct mailing address. | 1.30 |

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|--|-------|
| 03/25/2023 | CRM | B120 | A108 | Various emails with BlackBriar regarding wires and search and send all information for same to Shelby Jordan, co-counsel and BlackBriar. | 0.50 |
| 03/26/2023 | SAJ | B210 | A106 | Conference with debtor and co-counsel and work on Youngevity demand letter. | 1.00 |
| 03/27/2023 | SAJ | B210 | A109 | Prepare and attend hearings on cash collateral, sub chapter V revocation, status of discovery and issues regarding operations and Alex relationship with Mountain Way. | 3.20 |
| | SAJ | B210 | A106 | Four telephone calls with debtor. | 0.70 |
| | SAJ | B210 | A107 | Emails to co-counsel and debtor regarding mountain way and actual facts and prepare memo to co-counsel and conference with Ray Battaglia for September and October invoices. | 1.10 |
| | SAJ | B160 | A107 | Get fee agreements from Norm Pattis for execution by Jones. | 0.30 |
| 03/28/2023 | SAJ | B110 | A104 | review past notes and emails to determine if any dealt with Mount Way or McGill and MW. | 0.50 |
| | SAJ | B110 | A104 | Review Mountain Way invoices paid by FSS showing "Alex Jones Show... promoting Satellite Phone and related products" marked paid and review 11 other similar invoices all marked paid. | 1.00 |
| | SAJ | B110 | A107 | Conference with Battaglia and with co-counsel regarding Mountain Way. | 0.40 |
| | SAJ | B110 | A104 | Review draft of SOFA and Schedules. | 0.70 |
| | SAJ | B210 | A107 | Conference with co-counsel and debtor regarding mountain way and notice given on multiple occasions to McGill. | 0.70 |
| | SAJ | B120 | A103 | Prepare notice demand letter to Youngevity for payment of royalties due regarding suspended contract payments and add internet research sites and circulate to debtor and co-counsel. | 2.50 |
| | SAJ | B120 | A107 | Emails from RJ Shannon and co-counsel and emails to both regarding IP transfers. | 0.40 |
| | SAJ | B190 | A103 | Work on full summaries for response to motion regarding dischargeability and forward brief summary to co-counsel and set up conference call regarding dischargeability. | 2.10 |
| | SAJ | B190 | A107 | Review email from Chris Davis regarding team meeting before conference with Plaintiffs counsel on Friday. | 0.30 |
| 03/29/2023 | SAJ | B120 | A107 | Discussion with co-counsel regarding value of the 2022 litigation settlement trust and issues with assets, status, | |

April 06, 2023

JONES, ALEX

Account No: 5481-002000M
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Bankruptcy

| | | | | | | |
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| | | | ownership and status. | Hours 0.70 | | |
| | SAJ | B110 | A107 | Work on issues of Mountain Way and emails regarding Jess Schulze notice of Mountain Way and emails to co-counsel. | 0.50 | |
| | SAJ | B110 | A107 | Continue to review issues with Schedules and SOFA and comments from Porter UCC counsel and emails to co-counsel. | 0.80 | |
| | SAJ | B190 | A104 | Review POC docket and determine issues of objections to Plaintiffs claims and memo along with memo on claims estimate where no res judicate applies. | 1.90 | |
| 03/30/2023 | CRM | B150 | A109 | Attend continued 341 meeting and take notes for Shelby Jordan. | 0.90 | |
| | SAJ | B120 | A103 | Forward updated final draft of Youngevity demand letter to co-counsel after conference with Reese and debtor. | 0.80 | |
| 03/31/2023 | SAJ | B110 | A107 | Review email from Bob Schleizer regarding amended schedules and issue raised by Porter (comment) and co-counsel letter regarding value of trust. | 0.40 | |
| | SAJ | B110 | A104 | Review amended schedule A/B for completeness. | 0.30 | |
| | SAJ | B110 | A104 | Review Porter issues of non-cooperation with debtor counsel and comment. | 0.30 | |
| | SAJ | B160 | A108 | Email to Roger Borgelt regarding 2022 litigation trust representation and email to Rob Dew and Richard Dale to assure SOS and certificates of authority are being maintained and counsel is assisting Dew. | 0.60 | |
| | SAJ | B190 | A107 | Conference call with dischargeability team to review Monday and Tuesday matters and work on organization of research for team call. | 3.10 | |
| | SAJ | B190 | A107 | Attend conference call with Plaintiffs counsel regarding proposed scheduling order. | 1.00 | |
| | | | For Current Services Rendered | 80.40 | 46,820.00 | |
| | | | Total Non-billable Hours | 0.30 | | |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 75.70 | \$600.00 | \$45,420.00 |
| ANTONIO ORTIZ | Partners | 1.00 | 475.00 | 475.00 |
| CHRYSTAL MADDEN | Paralegals | 3.70 | 250.00 | 925.00 |

| | | | | |
|------------|------|------|-------|--------|
| 03/31/2023 | B110 | E106 | Pacer | 120.30 |
|------------|------|------|-------|--------|

JONES, ALEX

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April 06, 2023

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Bankruptcy

| | |
|--------------------|--------------------|
| Total Expenses | 120.30 |
| Total Current Work | 46,940.30 |
| Total Payments | -40,986.44 |
| Balance Due | <u>\$78,278.80</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|------------------|-----------------|
| B110 | Case Administration | 4320.00 | 120.30 |
| B120 | Asset Analysis and Recovery | 11735.00 | 0.00 |
| B140 | Relief from Stay/Adequate Protection Proceedings | 840.00 | 0.00 |
| B150 | Meetings of and Communications with Creditors | 225.00 | 0.00 |
| B160 | Fee/Employment Applications | 3060.00 | 0.00 |
| B170 | Fee/Employment Objections | 180.00 | 0.00 |
| B185 | Assumption/Rejection of Leases and Contracts | 1440.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 16560.00 | 0.00 |
| B100 | Administration | <u>38,360.00</u> | <u>120.30</u> |
| B210 | Business Operations | 6720.00 | 0.00 |
| B240 | Tax Issues | 180.00 | 0.00 |
| B200 | Operations | <u>6,900.00</u> | <u>0.00</u> |
| B320 | Plan and Disclosure Statement (including Business Plan) | 1020.00 | 0.00 |
| B300 | Claims and Plan | <u>1,020.00</u> | <u>0.00</u> |
| B410 | General Bankruptcy Advice/Opinions | 540.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | <u>540.00</u> | <u>0.00</u> |

Your trust account #1 balance is

| | | |
|------------|---|--------------------|
| | Opening Balance | \$84,393.51 |
| 03/10/2023 | Payment of January Fees (80% of fees and 100% of expenses) | -22,602.50 |
| 04/04/2023 | Payment of February Fees (80% of fees and 100% of expenses) | <u>-40,986.44</u> |
| | Closing Balance | <u>\$20,804.57</u> |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 7.2 | |
| B120 Asset Analysis and Recovery | 19.2 | 1.1 |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | 1.4 | |
| B150 Meetings of & Communications with Creditors | | .90 |
| B160 Fee/Employment Applications | 4.6 | 1.2 |
| B170 Fee/Employment Objections | .30 | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | 2.4 | |
| B190 Other Contested Matters | 27.8 | .50 |
| B195 Non-Working Travel | | |
| B210 Business Operations | 11.2 | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | .30 | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | | |
| B320 Plan and Disclosure Statement | 1.7 | |
| B410 General Bankruptcy Advice/Opinions | .9 | |
| B420 Restructurings | | |
| TOTALS: | 76.7 | 3.7 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**FIFTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
MAY 16, 2023 THROUGH JUNE 30, 2023**

| | | |
|---|-------------------------------------|----------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 05/16/2023 ¹ | 06/30/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$15,476.00 (80% of \$19,345.00) | |
| Total Reimbursable Expenses Requested in this Statement: | \$203.39 ² | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$18,420.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 30.70 | |
| Average Hourly Rate for Attorneys: | \$630.13 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$925.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 3.70 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |

¹ May 1-15, 2023 time was included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346).

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") fourth monthly fee statement for compensation (the "Fee Statement") for the period of May 16, 2023 through June 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$15,476.00 (80% of \$19,345.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$203.39 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period May 16, 2023 through June 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$15,476.00 (80% of fees in the amount of \$19,345.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$203.39 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$15,679.39 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: July 19, 2023

/s/ Shelby A. Jordan
 SHELBY A. JORDAN
 State Bar No. 11016700
 S.D. No. 2195
 ANTONIO ORTIZ
 State Bar No. 24074839
 S.D. No. 1127322
Jordan & Ortiz, P.C.
 500 North Shoreline Blvd., Suite 804
 Corpus Christi, TX 78401
 Telephone: (361) 884-5678
 Facsimile: (361) 888-5555
 Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
 Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on July 19, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT "A"

JORDAN & ORTIZ, P.C. MARCH INVOICE FOR PERIOD MAY 16, 2023 through June 30, 2023

SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED TO BE PAID UNDER DOCKET #346

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|--------------------|---------------------|---------------------|-------------|-------------------|----------------------|-----------------------|------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| TOTAL | | | | \$1,067.59 | \$244,690.09 | -\$146,790.16 | \$97,899.93 |

500 N. SHORELINE BLVD, SUITE 900
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
June 08, 2023
Account No: 5481-002000M
Statement No: 922462

Bankruptcy

| PREVIOUS BALANCE | | | | | \$97,899.93 |
|------------------|-----|------|------|--|-------------|
| | | | | | Hours |
| 05/16/2023 | SAJ | B110 | A106 | Call to debtor regarding meeting on Saturday. | 0.20 |
| | SAJ | B120 | A107 | Call and conference with Pattis on turnover of give-send-go fund to DIP account and wire instruction from co-counsel. | 0.30 |
| | SAJ | B190 | A107 | Follow up email to co-counsel again requesting a copy of the settlement agreement and status report of telephone conference with Isgur and settlement offer. | 0.20 |
| | SAJ | B190 | A107 | Call from Battaglia and email to Lemmon on settlement and PQPR (David and Carol) 2004 exam and Cicack 2004 exam. | 0.40 |
| 05/19/2023 | SAJ | B110 | A106 | Call with debtor. | 1.00 |
| | SAJ | B110 | A109 | Prepare and attend status conference with court and review timing of mediation offer and response. | 0.70 |
| | SAJ | B110 | A107 | Email and call from Pattis regarding appellate brief and discussions he had with debtor. | 0.70 |
| | SAJ | B110 | A107 | Email to co-counsel regarding items in status conference. | 0.40 |
| 05/22/2023 | SAJ | B110 | A107 | Telephone conference with Pattis and Battaglia regarding retention of fees due by FSS and Jones and work on documents needed. | 0.70 |
| | SAJ | B310 | A103 | Work on edits to Pattis appeal brief and telephone conference with Pattis. | 2.00 |
| 05/24/2023 | CRM | B160 | A103 | Revisions to first interim fee application and send to Shelby Jordan for approval. | 2.20 |
| 05/26/2023 | SAJ | B190 | A104 | Review relief from stay filed by De La Rosa and Posner. | 0.40 |
| | SAJ | B190 | A106 | Call and conference with debtor regarding June 14 hearing. | 0.40 |

JONES, ALEX

Page: 2

June 08, 2023

Account No: 5481-002000M
Statement No: 922462

Bankruptcy

| | | | | Hours | | |
|------------|-----|------|------|--|-------|----------|
| | SAJ | B190 | A103 | Final review and forward edits and conference with Pattis regarding edits done to prior appellate brief. | 1.80 | |
| 05/29/2023 | CRM | B160 | A103 | Final review and revisions to first interim fee application and proposed order and file and serve same. | 1.50 | |
| | SAJ | B190 | A103 | Work on final drafts edits to Norm Pattis appeal brief and record excerpts. | 2.00 | |
| 05/30/2023 | SAJ | B190 | A103 | Work on new final drafts edits to Norm Pattis appeal brief and record excerpts and telephone conference with Pattis. | 2.30 | |
| 05/31/2023 | SAJ | B110 | A107 | Call from Pattis regarding attorneys fees remaining and questions of FSS non-payment; email to co-counsel and call to Battaglia. | 0.70 | |
| | SAJ | B190 | A107 | Conference with Pattis regarding appeal brief and my expected edits and work on edits. | 0.80 | |
| | | | | For Current Services Rendered | 18.70 | 9,925.00 |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 15.00 | \$600.00 | \$9,000.00 |
| CHRYSTAL MADDEN | Paralegals | 3.70 | 250.00 | 925.00 |

| | | | | |
|------------|------|------|-------------------------|---------------------|
| 05/31/2023 | B110 | E106 | Online Research - Lexis | 16.99 |
| 05/31/2023 | B110 | E106 | Online research - Pacer | 172.10 |
| | | | Total Expenses | 189.09 |
| | | | Total Current Work | 10,114.09 |
| | | | Balance Due | <u>\$108,014.02</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 2640.00 | 189.09 |
| B120 | Asset Analysis and Recovery | 180.00 | 0.00 |
| B160 | Fee/Employment Applications | 925.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 4980.00 | 0.00 |
| B100 | Administration | 8,725.00 | 189.09 |
| B310 | Claims Administration and Objections | 1200.00 | 0.00 |
| B300 | Claims and Plan | 1,200.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

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JONES, ALEX
alexejones1777@gmail.com

Page: 1
July 11, 2023
Account No: 5481-002000M
Statement No: 922517

Bankruptcy

| PREVIOUS BALANCE | | | | | | \$108,014.02 |
|------------------|-----|------|------|--|-------|--------------|
| | | | | | Hours | |
| 06/02/2023 | SAJ | B120 | A104 | Review ESG emergency motion to quash discovery and call to client. | 0.30 | |
| 06/05/2023 | SAJ | B110 | A106 | Call to client regarding current status of outstanding issues. | 0.30 | |
| | SAJ | B160 | A107 | Email and call to Battaglia regarding Connecticut appeal fee due Pattis. | 0.30 | |
| | SAJ | B190 | A107 | Conference with Pattis regarding appeal and appeal fees and status of additional California assistance by client/co-counsel. | 0.30 | |
| | SAJ | B190 | A107 | Email to co-counsel for first draft of response to MSJ. | 0.30 | |
| 06/06/2023 | SAJ | B110 | A106 | Call to client. | 0.20 | |
| | SAJ | B110 | A107 | Email to co-counsel regarding communications. | 0.20 | |
| | SAJ | B160 | A107 | Conference with Pattis regarding new counsel DH and review and call and message to Battaglia. | 0.40 | |
| | SAJ | B190 | A107 | Request draft copies of response to MSJ from co-counsel. | 0.20 | |
| 06/08/2023 | SAJ | B110 | A104 | Review docket for update in absence of communications from co-counsel. | 0.40 | n/c |
| 06/09/2023 | SAJ | B190 | A103 | Begin review of draft response to MSJ by Sandyhook Plaintiffs. | 2.80 | |
| 06/10/2023 | SAJ | B190 | A104 | Work on review and outline of CT and TX MSJ response and briefing. | 1.30 | |
| 06/11/2023 | SAJ | B190 | A104 | Continue review of draft of response to MSJ by Sandyhook Plaintiffs amended CT and TX briefing and make notes for appellate lawyers. | 2.10 | |
| 06/12/2023 | SAJ | B190 | A104 | Finish review of draft response to MSJ by Sandyhook plaintiffs amended CT and TX briefing and circulate copies and | | |

JONES, ALEX

Page: 2

July 11, 2023

Account No: 5481-002000M
Statement No: 922517

Bankruptcy

| | | | | Hours | | |
|------------|-----|------|--|---|-------|----------|
| | | | comments to Pattis and Martin for important ideas and briefing in the appeals. | 2.30 | | |
| 06/13/2023 | SAJ | B160 | A107 | Conference with Battaglia regarding Pattis application for appellate work and status of issues regarding mediation and counter-proposals from Sandy Hook plaintiffs. s | 0.40 | |
| | SAJ | B190 | A107 | Review and forward to Pattis and Martin filed copies of client's response to MSJ as appellate counsel for consideration in drafting appellate issues and arguments. | 0.70 | |
| 06/14/2023 | SAJ | B190 | A109 | Attend hearing on motion to lift stay tex other plaintiffs and emails to co-counsel regarding Court's response and questions. | 0.80 | |
| 06/23/2023 | SAJ | B170 | A107 | Circulate certificate of no objection to J&O fees and email to co-counsel and advisors and respond to reply regarding payment of 20% holdback and call to Battaglia. | 1.00 | |
| | SAJ | B190 | A107 | Email from Wholman of Randazo firm regarding bad faith claim and court ruling and forward to co-counsel. | 0.40 | |
| 06/29/2023 | SAJ | B110 | A107 | Multiple emails to co-counsel after attending hearings on cash collateral and 9019 settlement Pozner claims and offer in mediation and request status of co-counsel communications on these topics. | 0.40 | |
| | SAJ | B210 | A109 | Attend conference on cash collateral and 9019 Pozner settlement and conference with Battaglia. | 1.00 | |
| | | | | For Current Services Rendered | 15.70 | 9,420.00 |
| | | | | Total Non-billable Hours | 0.40 | |

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 15.70 | \$600.00 | \$9,420.00 |

| | | | | |
|------------|------|------|--------------------|---------------------|
| 06/30/2023 | B110 | E123 | Research - Pacer | 14.30 |
| | | | Total Expenses | 14.30 |
| | | | Total Current Work | 9,434.30 |
| | | | Balance Due | <u>\$117,448.32</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|-----------------------------|-------------|-----------------|
| B110 | Case Administration | 660.00 | 14.30 |
| B120 | Asset Analysis and Recovery | 180.00 | 0.00 |

JONES, ALEX

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July 11, 2023

Account No: 5481-002000M
Statement No: 922517

Bankruptcy

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B160 | Fee/Employment Applications | 660.00 | 0.00 |
| B170 | Fee/Employment Objections | 600.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 6720.00 | 0.00 |
| B100 | Administration | 8,820.00 | 14.30 |
| B210 | Business Operations | 600.00 | 0.00 |
| B200 | Operations | 600.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 5.5 | |
| B120 Asset Analysis and Recovery | .60 | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | 1.1 | 3.70 |
| B170 Fee/Employment Objections | 1.0 | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 19.5 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | 1.0 | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 2.0 | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | | |
| B420 Restructurings | | |
| TOTALS: | 30.7 | 3.70 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

CORRECTED

**SIXTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JULY 1, 2023 THROUGH JULY 31, 2023**

| | | |
|--|-----------------------------------|---------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 07/1/2023 | 07/31/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$4,364.00 (80% of \$5,455.00) | |
| Total Reimbursable Expenses Requested in this Statement: | \$203.39 ¹ | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$3,780.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 6.30 | |
| Average Hourly Rate for Attorneys: | \$600.00 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$1,675.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 6.70 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |

¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") sixth monthly fee statement for compensation (the "Fee Statement") for the period of July 1, 2023 through July 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its sixth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$4,364.00 (80% of \$5,455.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$0.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period July 1, 2023 through July 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category, including description, incurred with the amounts for which reimbursement is requested. Exhibit

“A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested

fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$4,364.00 (80% of fees in the amount of \$5,455.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$4,364.00 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: September 18, 2023

/s/ Shelby A. Jordan
 SHELBY A. JORDAN
 State Bar No. 11016700
 S.D. No. 2195
 ANTONIO ORTIZ
 State Bar No. 24074839
 S.D. No. 1127322
Jordan & Ortiz, P.C.
 500 North Shoreline Blvd., Suite 804
 Corpus Christi, TX 78401
 Telephone: (361) 884-5678
 Facsimile: (361) 888-5555
 Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
 Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on September 18, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD December 1, 2022 through June 30, 2023

SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED TO BE PAID UNDER DOCKET #346

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|--------------------|---------------------|---------------------|-------------|-------------------|----------------------|-----------------------|------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| 922462 | May 16-31 | 6/8/23 | \$9,925.00 | \$189.09 | \$10,114.09 | \$0.00 | \$10,114.09 |
| 922517 | June | 7/11/23 | \$9,420.00 | \$14.30 | \$9,434.30 | \$0.00 | \$9,434.30 |
| 922607 | July | 8/3/23 | \$5,455.00 | \$0.00 | \$5,455.00 | \$0.00 | \$5,455.00 |
| TOTAL | | | | \$1,270.98 | \$269,693.48 | -\$146,790.16 | \$122,903.32 |

JORDAN, DEPT. OF PROBATION
500 N. SHORELINE BLVD, SUITE 804
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
August 03, 2023
Account No: 5481-002000M
Statement No: 922607

Bankruptcy

PREVIOUS BALANCE

\$117,448.32

| | | | | | Hours |
|------------|-----|------|------|---|-------|
| 07/07/2023 | SAJ | B110 | A104 | Work on edits on employment agreement for client with FSS. | 1.80 |
| 07/09/2023 | SAJ | B110 | A104 | Pull prior employment agreement and review the employment agreement contract and compare issues. | 0.40 |
| 07/10/2023 | SAJ | B110 | A103 | Finish edits to employment agreement and forward to co-counsel with email and indemnity question. | 0.40 |
| 07/13/2023 | SAJ | B190 | A104 | Work on document production for client's efforts to acquire annuity under employment agreement and email to co-counsel regarding attorney client privileged communications. | 0.60 |
| 07/14/2023 | CRM | B190 | A104 | Email from Shelby Jordan to pull emails regarding annuity for possible production for Vickie Driver and begin pulling. | 2.00 |
| | SAJ | B190 | A104 | Begin to pull emails regarding annuities and emails to co-counsel regarding same. | 1.00 |
| 07/17/2023 | CRM | B190 | A104 | Continue to pull emails regarding annuity for possible production for Vickie Driver. | 2.20 |
| 07/18/2023 | CRM | B190 | A104 | Continue to pull emails regarding annuity for possible production for Vickie Driver and email same to Shelby Jordan. | 1.00 |
| | CRM | B160 | A103 | Prepare draft of fifth notice of monthly fee statements for May and June and email same to Shelby Jordan for revisions and approval to file. | 1.00 |
| 07/19/2023 | CRM | B160 | A103 | File and serve 5th monthly fee statement. | 0.50 |
| 07/20/2023 | SAJ | B190 | A104 | Work on document email production (AEJ regarding annuity efforts to purchase) to forward to co-counsel summary of background on annuity planning and transactions. | 1.10 |
| 07/24/2023 | SAJ | B190 | A104 | Finish internal review of email to pull all relevant to annuity issue and email to co-counsel that none extra are found. | 0.70 |

JONES, ALEX

Page: 2

August 03, 2023

Account No: 5481-002000M
Statement No: 922607

Bankruptcy

Hours

| | | | | | | |
|------------|-----|------|------|--|-------|----------|
| 07/25/2023 | SAJ | B190 | A107 | Email to co-counsel regarding production of emails from J&O regarding annuity and pull ones marked by J&O as non-privileged. | 0.30 | |
| | | | | For Current Services Rendered | 13.00 | 5,455.00 |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 6.30 | \$600.00 | \$3,780.00 |
| CHRYSTAL MADDEN | Paralegals | 6.70 | 250.00 | 1,675.00 |

| | | | | | | |
|------------|--|------|------|--------------------|--|---------------------|
| 07/31/2023 | | B110 | E106 | Pacer | | |
| | | | | Total Current Work | | 5,455.00 |
| | | | | Balance Due | | <u>\$122,903.32</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 1560.00 | 0.00 |
| B160 | Fee/Employment Applications | 375.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 3520.00 | 0.00 |
| B100 | Administration | 5,455.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 2.6 | |
| B120 Asset Analysis and Recovery | | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | | 1.5 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 3.7 | 5.2 |
| B195 Non-Working Travel | | |
| B210 Business Operations | | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | | |
| B420 Restructurings | | |
| TOTALS: | 6.3 | 6.7 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**SEVENTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
AUGUST 1, 2023 THROUGH AUGUST 30, 2023**

| | | |
|---|-----------------------------------|----------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 08/1/2023 | 08/30/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$3,628.00 (80% of \$4,535.00) | |
| Total Reimbursable Expenses Requested in this Statement: | 32.50 ¹ | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$4,260.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 7.10 | |
| Average Hourly Rate for Attorneys: | \$600.00 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$275.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 1.10 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |

¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") seventh monthly fee statement for compensation (the "Fee Statement") for the period of August 1, 2023 through August 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its seventh monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$3,628.00 (80% of \$4,535.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$32.50 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period August 1, 2023 through August 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$3,628.00 (80% of fees in the amount of \$4,535.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$32.50 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$3,660.50 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: September 18, 2023

/s/ Shelby A. Jordan
 SHELBY A. JORDAN
 State Bar No. 11016700
 S.D. No. 2195
 ANTONIO ORTIZ
 State Bar No. 24074839
 S.D. No. 1127322
Jordan & Ortiz, P.C.
 500 North Shoreline Blvd., Suite 804
 Corpus Christi, TX 78401
 Telephone: (361) 884-5678
 Facsimile: (361) 888-5555
 Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
 Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on September 18, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD December 1, 2022 through July 31, 2023

SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED TO BE PAID UNDER DOCKET #346

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|---------------------------|----------------------------|----------------------------|---------------------|------------------------|-----------------------------|------------------------------|-------------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| 922462 | May 16-31 | 6/8/23 | \$9,925.00 | \$189.09 | \$10,114.09 | \$0.00 | \$10,114.09 |
| 922517 | June | 7/11/23 | \$9,420.00 | \$14.30 | \$9,434.30 | \$0.00 | \$9,434.30 |
| 922607 | July | 8/3/23 | \$5,455.00 | \$0.00 | \$5,455.00 | \$0.00 | \$5,455.00 |
| 922637 | August | 9/7/23 | \$4,535.00 | \$32.50 | \$4,567.50 | \$0.00 | \$4,567.50 |
| TOTAL | | | \$272,957.50 | \$1,303.48 | 274,260.98 | -\$146,790.16 | \$127,470.82 |

500 N. SHORELINE BLVD, SUITE 804
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
September 07, 2023
Account No: 5481-002000M
Statement No: 922637

Bankruptcy

| PREVIOUS BALANCE | | | | | | \$122,903.32 |
|------------------|-----|------|------|---|--|--------------|
| | | | | | | Hours |
| 08/01/2023 | SAJ | B410 | A106 | Return call from client regarding operations, income, fees. | | 0.70 |
| | SAJ | B410 | A107 | Email to Crissy Stephenson seeking time to be updated on status of case. | | 0.20 |
| | | | | | | n/c |
| 08/07/2023 | SAJ | B190 | A106 | Call from client regarding status hearing on MSJ and detailed discussion of Court's response and expected arguments by counsel. | | 1.10 |
| 08/08/2023 | SAJ | B160 | A103 | Review new draft with Shelby Jordan edits to CRO application and effort to avoid veto of TDA and Harco on waiver of mediation privilege and call to Langston. | | 0.70 |
| | SAJ | B310 | A109 | Listen to status conference on MSJ on non-dischargeability. | | 0.70 |
| 08/15/2023 | CRM | B160 | A103 | Prepare 6th Monthly Fee Statement and file and serve same. | | 0.60 |
| | SAJ | B190 | A109 | Attend hearing on oral arguments, MSJ and conference with client regarding hearing and expected outcome. | | 2.50 |
| 08/17/2023 | CRM | B160 | A103 | Final revisions to 6th monthly fee statement notice and file and serve same. | | 0.50 |
| 08/18/2023 | SAJ | B110 | A106 | Review and forward FSS MOR to client with comments. | | 0.30 |
| 08/29/2023 | SAJ | B110 | A106 | Conference with client regarding latest order for DIP without new salary for Jones and email to co-counsel who clarifies. | | 0.40 |
| | SAJ | B110 | A107 | Conference regarding Andino Reynal and hour rate and decision to retain for potential October trial and email to co-counsel. | | 0.30 |
| 08/31/2023 | SAJ | B110 | A106 | Call from client regarding current status issues. | | 0.40 |
| | | | | For Current Services Rendered | | 8.20 |
| | | | | Total Non-billable Hours | | 0.20 |
| | | | | | | 4,535.00 |

JONES, ALEX

September 07, 2023

Account No: 5481-002000M

Statement No: 922637

Bankruptcy

| <u>Timekeeper</u> | <u>Recapitulation</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|-----------------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 7.10 | \$600.00 | \$4,260.00 |
| CHRYSTAL MADDEN | Paralegals | 1.10 | 250.00 | 275.00 |

| | | | | |
|------------|------|------|--------------------|---------------------|
| 08/31/2023 | B110 | E106 | Pacer | 32.50 |
| | | | Total Expenses | 32.50 |
| | | | Total Current Work | 4,567.50 |
| | | | Balance Due | <u>\$127,470.82</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 840.00 | 32.50 |
| B160 | Fee/Employment Applications | 695.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 2160.00 | 0.00 |
| B100 | Administration | 3,695.00 | 32.50 |
| B310 | Claims Administration and Objections | 420.00 | 0.00 |
| B300 | Claims and Plan | 420.00 | 0.00 |
| B410 | General Bankruptcy Advice/Opinions | 420.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | 420.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 1.4 | |
| B120 Asset Analysis and Recovery | | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | 0.7 | 1.1 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 3.6 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 0.7 | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | 0.7 | |
| B420 Restructurings | | |
| TOTALS: | 7.1 | 1.1 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**EIGHTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

| | | |
|--|-------------------------------------|---------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 09/1/2023 | 09/30/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$12,688.00 (80% of \$15,860.00) | |
| Total Reimbursable Expenses Requested in this Statement: | \$16.10 ¹ | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$15,660.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 26.10 | |
| Average Hourly Rate for Attorneys: | \$600.00 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$200.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 0.80 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |

¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") eighth monthly fee statement for compensation (the "Fee Statement") for the period of September 1, 2023 through September 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its eighth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$12,688.00 (80% of \$15,860.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$16.10 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit "A" is the Fee Statement for the period September 1, 2023 through September 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$12,688.00 (80% of fees in the amount of \$15,860.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$16.10 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$12,704.10 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: October 10, 2023

/s/ Shelby A. Jordan
 SHELBY A. JORDAN
 State Bar No. 11016700
 S.D. No. 2195
 ANTONIO ORTIZ
 State Bar No. 24074839
 S.D. No. 1127322
Jordan & Ortiz, P.C.
 500 North Shoreline Blvd., Suite 804
 Corpus Christi, TX 78401
 Telephone: (361) 884-5678
 Facsimile: (361) 888-5555
 Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
 Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on October 10, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
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- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
SEPTEMBER 1, 2023 through SEPTEMBER 30, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|---------------------------|----------------------------|----------------------------|---------------------|------------------------|-----------------------------|------------------------------|-------------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| TOTAL | | | \$272,957.50 | \$1,303.48 | 274,260.98 | -\$146,790.16 | \$127,470.82 |

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

JONES ALEX & ORTIZ LLC
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 October 04, 2023
 Account No: 5481-002000M
 Statement No: 922703

Bankruptcy

| PREVIOUS BALANCE | | | | | | \$127,470.82 |
|------------------|-----|------|------|---|-------|--------------|
| | | | | | Hours | |
| 09/06/2023 | SAJ | B190 | A107 | Email to co-counsel regarding 2004 Examination of Alex Jones on the 12th (next Tuesday) and attendance and call from client. | 0.30 | 180.00 |
| | SAJ | B190 | A107 | Email to co-counsel regarding lack of objection to dischargeability regarding the original State Court suit alleging actual fraudulent transfers involving client and David Jones. | 0.50 | 300.00 |
| 09/08/2023 | SAJ | B410 | A103 | Pull prior form of motion and briefing on issues to report to court (including some original 2022 issues) and work on updating for co-counsel. | 1.80 | 1,080.00 |
| 09/10/2023 | SAJ | B110 | A102 | Pull research on indemnity, expense reimbursement, client salary and double reductions and client contributions of \$10M in assets in 2023 and clients \$1M administrative claims. | 1.40 | 840.00 |
| 09/11/2023 | SAJ | B110 | A103 | Work on locating final motion to recover trial expenses and disclosing cost sharing responses to Court's inquiry regarding 25% of trial costs. | 1.10 | 660.00 |
| | SAJ | B110 | A107 | Trip to client office and meeting with co-counsel and work on issues for 2004 exam and for pleading disclosing issues requested by the court since and finish search and additions to 2004 exam issues and expense motion 2022. | 2.60 | 1,560.00 |
| 09/12/2023 | SAJ | B190 | A109 | Attend (remotely) 2004 examination of client and work and send real-time information to co-counsel in response to questions and answers. | 3.20 | 1,920.00 |
| | SAJ | B190 | A106 | Call to co-counsel and client regarding 2004 exam. | 0.20 | 120.00 |
| 09/13/2023 | SAJ | B190 | A109 | Attend part of 2004 exam and pull ESG issues from internet and call to client after examination. | 1.80 | 1,080.00 |
| | SAJ | B190 | A103 | Work on edits to co-counsel response to ROR filing by Committee and support citations to record for arguments. | 2.60 | 1,560.00 |

Bankruptcy

| | | | | | Hours | |
|------------|-----|------|------|--|-------|----------|
| 09/14/2023 | SAJ | B190 | A103 | Work on version 2 and 3 of response to ROR and circulate to co-counsel and conference with client. | 2.00 | 1,200.00 |
| 09/15/2023 | CRM | B160 | A103 | Prepare 7th monthly fee statement and email to Shelby Jordan for approval. | 0.60 | 150.00 |
| | SAJ | B110 | A104 | Review co-counsel editing of ROR response and additional edits sent to co-counsel for approval and filing. | 2.60 | 1,560.00 |
| | SAJ | B320 | A106 | Conference with client regarding ROR memo, edits and information included in reply. | 0.40 | 240.00 |
| 09/18/2023 | CRM | B160 | A103 | File Corrected 6th Monthly Fee Statement and 7th Monthly Fee Statement. | 0.20 | 50.00 |
| 09/19/2023 | SAJ | B110 | A104 | Review MOR of both FSS and client and email to co-counsel regarding \$2.5 M retained in FSS with client unable to pay administrative expenses. | 0.30 | 180.00 |
| | SAJ | B120 | A106 | Conference with client regarding Joey Delano 2004 exam and status. | 0.20 | 120.00 |
| 09/20/2023 | SAJ | B210 | A104 | Review MOR from FSS and AEJ regarding salary issues and inability to fund Ch 11 expenses by FSS retention of all its needed funds. | 0.40 | 240.00 |
| 09/22/2023 | SAJ | B110 | A107 | Email to co-counsel regarding salary issues and additional articles on draws from FSS by client misquoted by Sandy Hook counsel first day. | 0.40 | 240.00 |
| 09/25/2023 | SAJ | B110 | A107 | Call to Battaglia regarding hearing on cash collateral and funds available from FSS to client. | 0.20 | 120.00 |
| 09/26/2023 | SAJ | B210 | A109 | Listen to hearing on cash collateral and related agreements to transfer funds to client regarding administrative claims for advances and for past and current salary (1.4 but only bill .5). | 0.50 | 300.00 |
| 09/28/2023 | SAJ | B190 | A104 | Review 2004 exam notice of scheduling and call to Steve Lemmon and David Jones counsel and email to co-counsel regarding availability of remote attendance. | 0.60 | 360.00 |
| | SAJ | B190 | A106 | Call to client regarding David Jones 2004 exam and email to co-counsel regarding David Jones exam. | 0.50 | 300.00 |
| 09/29/2023 | SAJ | B110 | A107 | Telephone conference with Battaglia regarding DIP bank account closure and issue of mediation ending and confirmation to be set and Court's ruling on MSJ of Plaintiffs. | 0.70 | 420.00 |
| | SAJ | B110 | A107 | Call to Norm Pattis and conference call with client on related potential reasons government wants bank access by client removed. | 0.60 | 360.00 |

JONES, ALEX

October 04, 2023

Account No: 5481-002000M
Statement No: 922703

Bankruptcy

| | | | | Hours | |
|------------|-----|------|--|-------|-----------|
| 09/30/2023 | SAJ | B110 | A106 Telephone conference with client memo and call to client regarding Battaglia, Pattis regarding banking issues and potential subpoena and update on status of FSS. | 1.20 | 720.00 |
| | | | For Current Services Rendered | 26.90 | 15,860.00 |

| | | Recapitulation | | |
|-------------------|--------------|----------------|-------------|--------------|
| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| SHELBY A. JORDAN | Partners | 26.10 | \$600.00 | \$15,660.00 |
| CHRYSTAL MADDEN | Paralegals | 0.80 | 250.00 | 200.00 |

| | | | | |
|------------|------|------|---------------------------|---------------------|
| 09/30/2023 | B110 | E106 | Computer Research - Pacer | 16.10 |
| | | | Total Expenses | 16.10 |
| | | | Total Current Work | 15,876.10 |
| | | | Total Payments | -30,727.29 |
| | | | Balance Due | <u>\$112,619.63</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 6660.00 | 16.10 |
| B120 | Asset Analysis and Recovery | 120.00 | 0.00 |
| B160 | Fee/Employment Applications | 200.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 7020.00 | 0.00 |
| B100 | Administration | 14,000.00 | 16.10 |
| B210 | Business Operations | 540.00 | 0.00 |
| B200 | Operations | 540.00 | 0.00 |
| B320 | Plan and Discosure Statement (including Business Plan) | 240.00 | 0.00 |
| B300 | Claims and Plan | 240.00 | 0.00 |
| B410 | General Bankruptcy Advice/Opinions | 1080.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | 1,080.00 | 0.00 |

Your trust account #1 balance is

| | | |
|------------|----------------------|----------|
| | Opening Balance | \$0.00 |
| 09/19/2023 | Interim Wire Payment | 8,974.35 |

JONES, ALEX

Account No: 5481-002000M
Statement No: 922703

Bankruptcy

| | | |
|------------|--------------------------------------|------------|
| 09/21/2023 | Payment on 922199 | -8,974.35 |
| 09/28/2023 | Interim Wire Payment | 21,752.94 |
| 10/03/2023 | Payment on 922199, 922213 and 922268 | -21,752.94 |
| | Closing Balance | \$0.00 |

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 11.10 | |
| B120 Asset Analysis and Recovery | 0.20 | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | | 0.80 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 11.70 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | 0.90 | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | | |
| B320 Plan and Disclosure Statement | 0.40 | |
| B410 General Bankruptcy Advice/Opinions | 1.80 | |
| B420 Restructurings | | |
| TOTALS: | 26.10 | .80 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**NINTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

| | | |
|---|------------------------------|-----------------------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 10/1/2023 | 10/31/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | | \$7,916.00 (80% of \$9,895.00) |
| Total Reimbursable Expenses Requested in this Statement: | | \$0.00 ¹ |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | | \$9,420.00 |
| Total Actual Attorneys Hours Covered by this Statement: | | 15.70 |
| Average Hourly Rate for Attorneys: | | \$600.00 |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | | \$475.00 |
| Total Actual Paraprofessional Hours Covered by this Statement: | | 1.90 |
| Average Hourly Rate for Paraprofessionals: | | \$250.00 |

¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") ninth monthly fee statement for compensation (the "Fee Statement") for the period of October 1, 2023 through October 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its ninth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$7,916.00 (80% of \$9,895.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$0.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit "A" is the Fee Statement for the period October 1, 2023 through October 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$7,916.00 (80% of fees in the amount of \$9,895.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$7,916.00 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: November 9, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on November 9, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
OCTOBER 1, 2023 through OCTOBER 31, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|---------------------------|----------------------------|----------------------------|---------------------|------------------------|-----------------------------|------------------------------|-------------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| TOTAL | | | \$272,957.50 | \$1,303.48 | 274,260.98 | -\$146,790.16 | \$127,470.82 |

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 11.50 | |
| B120 Asset Analysis and Recovery | | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | | 1.90 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 3.60 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 0.60 | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | | |
| B420 Restructurings | | |
| TOTALS: | 15.80 | 1.90 |

JORDAN & DRTZ, LLP
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 November 06, 2023
 Account No: 5481-002000M
 Statement No: 922768

Bankruptcy

| PREVIOUS BALANCE | | | | | | \$112,619.63 |
|------------------|-----|------|------|--|-------|--------------|
| | | | | | Hours | |
| 10/02/2023 | SAJ | B110 | A106 | Email to client and Lemmon and co-counsel. | 0.40 | 240.00 |
| | SAJ | B110 | A106 | Conference with client and conference call with co-counsel and client regarding issues with FFC CRO and status of funding, book arrangement, salary and other matters. | 1.20 | 720.00 |
| | SAJ | B190 | A109 | Attend 2004 exam of David Jones (actual time spend 4.0). | 1.50 | 900.00 |
| 10/03/2023 | SAJ | B110 | A106 | Three calls with client regarding discussions yesterday with client, Shelby Jordan and co-counsel and timing of bringing issues to Court's attention if CRO continues to refuse to deal with income and salary issues and email to co-counsel. | 0.70 | 420.00 |
| 10/04/2023 | SAJ | B110 | A106 | Call from client and review regarding Ch V and issue raised regarding McGill opposition to repayment of administrative claim and email to co-counsel. | 0.40 | 240.00 |
| 10/05/2023 | SAJ | B110 | A106 | Call from client regarding Chapter V and issue raised regarding McGill opposition to repayment of administrative claim and client request to call Battaglia. | 0.60 | 360.00 |
| 10/06/2023 | SAJ | B110 | A106 | Conference with client regarding funds holdup by FSS and issue of consent to hold up by SubV Trustee. | 0.40 | 240.00 |
| | SAJ | B110 | A107 | Call to Battaglia and message. | 0.20 | 120.00 |
| 10/07/2023 | SAJ | B110 | A106 | Conference with client regarding refusal of McGill to approve salary or administrative expenses. | 0.40 | 240.00 |
| | SAJ | B110 | A107 | Conference with Pattis and email to co-counsel to object to demand estate incur expense to travel to Georgia for testimony and retention of Pattis by estate to deal with Georgia vs Trump. | 0.50 | 300.00 |
| 10/09/2023 | CRM | B160 | A103 | Prepare 8th Monthly Fee Statement and email to Shelby Jordan for approval. | 0.50 | 125.00 |

Bankruptcy

| | | | | | Hours | |
|------------|-----|------|------|--|-------|--------|
| | CRM | B160 | A103 | Start draft of 2nd Interim Fee Statement. | 1.10 | 275.00 |
| | SAJ | B110 | A106 | Call to client to verify not contacting McGill directly subpoena from GA State Court. | 0.30 | 180.00 |
| 10/10/2023 | CRM | B160 | A103 | File 8th Monthly Fee Statement and serve same. | 0.30 | 75.00 |
| | SAJ | B110 | A107 | Conference with Pattis regarding Georgia subpoenas and objection by client and call to client regarding same. | 0.60 | 360.00 |
| 10/12/2023 | SAJ | B110 | A107 | Conference with Ray Battaglia regarding issues with McGill and plan confirmation without agreements between Texas and Connecticut Plaintiffs. | 0.30 | 180.00 |
| | SAJ | B110 | A106 | Email and call from client on meeting in Houston without invitation to attend. | 0.20 | 120.00 |
| 10/16/2023 | SAJ | B110 | A107 | Review email from co-counsel regarding budget of fees and reply. | 0.40 | 240.00 |
| 10/19/2023 | SAJ | B110 | A107 | Conference with co-counsel and email regarding budgeting. | 0.20 | 120.00 |
| | SAJ | B110 | A106 | Conference with client regarding MSJ rulings TX and Conn and set up meeting tomorrow. | 0.50 | 300.00 |
| | SAJ | B110 | A107 | Conference wit co-counsel regarding rulings. | 0.20 | 120.00 |
| | SAJ | B110 | A107 | Conference with Norm Pattis regarding Georgia subpoena and representation locally of Alex Jones and MSJ ruling in Conn case. | 1.00 | 600.00 |
| | SAJ | B310 | A104 | Read both MSJ rulings by Court and outline issues and questions to co-counsel handling briefing and arguments. | 0.60 | 360.00 |
| 10/20/2023 | SAJ | B190 | A106 | Meeting in office with client regarding Court's MSJ orders. | 1.30 | 780.00 |
| | SAJ | B190 | A107 | Call to co-counsel and telephone conference with co-counsel and MSJ team to discuss orders and going forward strategy. | 0.80 | 480.00 |
| 10/23/2023 | SAJ | B110 | A106 | Call and conference with client regarding issue of non-payment of salary and MSJ and continued decision to work. | 0.80 | 480.00 |
| 10/24/2023 | SAJ | B110 | A106 | Conference with client and conference with co-counsel regarding ongoing refusal to adjust salary and ongoing refusal to fund administrative expense. | 1.10 | 660.00 |
| 10/26/2023 | SAJ | B110 | A106 | Telephone conference with client regarding strategy regarding MSJ, Lopez docket, current issues with Sub Ch V lawyer and potential resignation and update on turmoil in SDTX system. | 0.50 | 300.00 |
| 10/27/2023 | SAJ | B110 | A106 | Follow up call with client regarding strategy in face of SDTX docket and judge issues and appeal. | 0.60 | 360.00 |

JONES, ALEX

November 06, 2023

Account No: 5481-002000M
Statement No: 922768

Bankruptcy

| | | | | |
|--|-------------------------------|--|--------------|----------|
| | | | <u>Hours</u> | |
| | For Current Services Rendered | | 17.60 | 9,895.00 |

| | | | | | |
|-------------------|--|----------------|--------------|-------------|--------------|
| | | | | | |
| | | Recapitulation | | | |
| <u>Timekeeper</u> | | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| SHELBY A. JORDAN | | Partners | 15.70 | \$600.00 | \$9,420.00 |
| CHRYSTAL MADDEN | | Paralegals | 1.90 | 250.00 | 475.00 |

| | | | | |
|--|--------------------|--|--|----------|
| | Total Current Work | | | 9,895.00 |
|--|--------------------|--|--|----------|

| | | | | |
|--|-------------|--|--|---------------------|
| | Balance Due | | | <u>\$122,514.63</u> |
|--|-------------|--|--|---------------------|

Task Code Summary

| | | | | |
|------|--|--|-------------|-----------------|
| | | | <u>Fees</u> | <u>Expenses</u> |
| B110 | Case Administration | | 6900.00 | 0.00 |
| B160 | Fee/Employment Applications | | 475.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | | 2160.00 | 0.00 |
| B100 | Administration | | 9,535.00 | 0.00 |
| B310 | Claims Administration and Objections | | 360.00 | 0.00 |
| B300 | Claims and Plan | | 360.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**TENTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

| | | |
|---|------------------------------|-----------------------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 11/01/2023 | 11/30/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | | \$5,092.00 (80% of \$6,365.00) |
| Total Reimbursable Expenses Requested in this Statement: | | \$65.00 ¹ |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | | \$6,240.00 |
| Total Actual Attorneys Hours Covered by this Statement: | | 10.40 |
| Average Hourly Rate for Attorneys: | | \$600.00 |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | | \$125.00 |
| Total Actual Paraprofessional Hours Covered by this Statement: | | 0.50 |
| Average Hourly Rate for Paraprofessionals: | | \$250.00 |

¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") ninth monthly fee statement for compensation (the "Fee Statement") for the period of November 1, 2023 through November 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its ninth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$5,092.00 (80% of \$6,365.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$65.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit "A" is the Fee Statement for the period November 1, 2023 through November 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$5,092.00 (80% of fees in the amount of \$6,365.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$65.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$5,157.000 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: December 12, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on December 12, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

USDAO FILED IN TX
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 December 06, 2023
 Account No: 5481-002000M
 Statement No: 922835

Bankruptcy

| PREVIOUS BALANCE | | | | | \$122,514.63 | |
|------------------|-----|------|------|---|--------------|----------|
| | | | | | Hours | |
| 11/02/2023 | SAJ | B110 | A107 | Conference with co-counsel regarding new developments in plan, negotiations, status of pending claims in Texas and client position. | 0.30 | 180.00 |
| | SAJ | B110 | A106 | Conference with client. | 0.40 | 240.00 |
| 11/05/2023 | SAJ | B110 | A106 | Call from client regarding status of appeals and potential for settlements. | 0.30 | 180.00 |
| 11/09/2023 | CRM | B160 | A103 | Prepare 9th Monthly Fee Notice and file and serve same. | 0.50 | 125.00 |
| 11/10/2023 | SAJ | B110 | A104 | Review budget from co-counsel and work on budget and forward. | 0.60 | 360.00 |
| | SAJ | B210 | A104 | Review brief and edit for Texas appeal and copy to Chris Martin. | 1.00 | 600.00 |
| 11/12/2023 | SAJ | B110 | A106 | Call to client regarding statement in broadcast about resolutions. | 0.20 | 120.00 |
| 11/13/2023 | SAJ | B190 | A104 | Review proposal by Debtors for settlement and calls to co-counsel and call from and to Battaglia. | 1.70 | 1,020.00 |
| 11/14/2023 | SAJ | B190 | A103 | Work on additional edits to the proposed settlement outline. | 0.70 | 420.00 |
| 11/15/2023 | SAJ | B130 | A106 | Review and telephone conference with client regarding sale of exempt assets on-line. | 0.30 | 180.00 |
| 11/16/2023 | SAJ | B110 | A103 | Pull and prepare initial accounting to disclose any funds paid for bankruptcy advise and petition preparation in the SOFA. | 0.80 | 480.00 |
| | SAJ | B110 | A107 | Review and forward to co-counsel Jay Wolman's email regarding client's claim against Erica Garbatini bankruptcy. | 0.40 | 240.00 |
| | SAJ | B410 | A106 | Call from client regarding sale of his exempt property and reminder of Governor Conoly's Chapter 7 sale of his | | |

Bankruptcy

| | | | | | | |
|-------------------|-----|------|------|--|---------------|---------------------|
| | | | | non-exempt property. | Hours 0.40 | 240.00 |
| 11/21/2023 | SAJ | B110 | A107 | Emails to co-counsel regarding status of settlement and NY trip and call to client regarding same. | 0.40 | 240.00 |
| 11/22/2023 | SAJ | B110 | A107 | Email and call to co-counsel regarding 2004 exam of Bob R and status of NY trip and settlement and review motion for status conference and issues raised by Motion and MOR filed. | 0.50 | 300.00 |
| | SAJ | B110 | A104 | Review exhibit list for client question on EGS hearing on rejection of contacts (whiskey, EGS Agr). | 0.30 | 180.00 |
| | SAJ | B320 | A104 | Begin analysis on bean transactions and claim by GrainChain to disclaim profits and emails and call to Dundon Advisors. | 0.20 | 120.00 |
| 11/27/2023 | SAJ | B110 | A107 | Email to co-counsel on issues of hearing and \$650k salary for client and status of NY Settlement trip. | 0.20 | 120.00 |
| | SAJ | B110 | A107 | Call to Battaglia regarding hearing outcome, Judge response to motions and status of NY Settlement negotiations. | 0.50 | 300.00 |
| | SAJ | B110 | A104 | Review memo of status of offers exchanged to settle matters and telephone conference with co-counsel. | 0.20 | 120.00 |
| | SAJ | B320 | A104 | Review motion for creditor plan. | 0.30 | 180.00 |
| 11/29/2023 | SAJ | B110 | A107 | Call from Battaglia regarding funds sent by Axios from prior Chapter 11 of Health to address in Victoria and conference with Chrystal Madden to get report of location of check and call to ex CRO account name for direction. | 0.70 | 420.00 |
| | | | | For Current Services Rendered | 10.90 | 6,365.00 |
| Recapitulation | | | | | | |
| <u>Timekeeper</u> | | | | <u>Title</u> | <u>Hours</u> | <u>Rate</u> |
| SHELBY A. JORDAN | | | | Partners | 10.40 | \$600.00 |
| CHRYSTAL MADDEN | | | | Paralegals | 0.50 | 250.00 |
| 11/30/2023 | | B110 | E106 | Pacer | | 65.00 |
| | | | | Total Expenses | | 65.00 |
| | | | | Total Current Work | | 6,430.00 |
| | | | | Total Payments | | -28,915.38 |
| | | | | Balance Due | | <u>\$100,029.25</u> |

Bankruptcy

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 3480.00 | 65.00 |
| B130 | Asset Disposition | 180.00 | 0.00 |
| B160 | Fee/Employment Applications | 125.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 1440.00 | 0.00 |
| B100 | Administration | 5,225.00 | 65.00 |
| B210 | Business Operations | 600.00 | 0.00 |
| B200 | Operations | 600.00 | 0.00 |
| B320 | Plan and Disclosure Statement (including Business Plan) | 300.00 | 0.00 |
| B300 | Claims and Plan | 300.00 | 0.00 |
| B410 | General Bankruptcy Advice/Opinions | 240.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | 240.00 | 0.00 |

Your trust account #1 balance is

| | | |
|------------|--------------------------------------|------------|
| | Opening Balance | \$0.00 |
| 11/16/2023 | Interim Wire Payment | 28,915.38 |
| 11/16/2023 | Payment on 922268, 922376 and 922405 | -28,915.38 |
| | Closing Balance | \$0.00 |

The entry N/C signifies time spent for which there will be no charge.

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Interim Amount Applied Per #346</u> | <u>Remaining Balance Due</u> |
|------------------------------|---------------------|---------------------|---------------------|-------------------|----------------------|-----------------------|--|------------------------------|
| First Fee Application | | | | | | | | |
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 | \$0.00 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 | \$0.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 | \$0.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 | \$0.00 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$2,168.44 | \$13,391.56 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | | \$24,865.70 |
| | | TOTALS | \$243,622.50 | \$1,067.59 | \$244,690.09 | -\$146,790.16 | \$59,642.67 | \$38,257.26 |

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 5.80 | |
| B120 Asset Analysis and Recovery | | |
| B130 Asset Disposition | 0.30 | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | | 0.50 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 2.40 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | | |
| B320 Plan and Disclosure Statement | 0.50 | |
| B410 General Bankruptcy Advice/Opinions | 0.40 | |
| B420 Restructurings | | |
| TOTALS: | 10.40 | 0.50 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**FIRST INTERIM APPLICATION OF APPLICATION OF JORDAN & ORTIZ, P.C.
FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES INCURRED FOR THE PERIOD FROM DECEMBER 1, 2022
THROUGH MAY 15, 2023**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

SUMMARY

| | | |
|--|------------------------------|----------------------|
| Name Of Applicant: | Jordan & Ortiz, P.C. ("J&O") | |
| Applicant's Role In Case: | Co-Counsel to Debtor | |
| Indicate Whether This Is an Interim or Final Application: | Interim | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 01/01/2023 | May 15, 2023 |
| Total Period Covered by Any Prior Applications: | N/A | N/A |
| Total Amounts Awarded in All Prior Applications: | N/A | |
| Amount of Retainer Received in This Case: | \$146,790.16 | |
| Total Fees Applied for in This Application and in All Prior Applications (Include Any Retainer Amounts Applied or to Be Applied): | \$243,622.50 | |
| Total Professional Fees Requested in This Application: | \$237,172.50 | |
| Total Professional Hours Covered by This Application: | 396.10 | |
| Average Hourly Rate for Professionals: | \$540.45 | |
| Total Paraprofessional Fees Requested in This Application: | \$6,450.00 | |
| Total Paraprofessional Hours Covered by This Application: | 25.80 | |
| Average Hourly Rate for Paraprofessionals: | \$193.80 | |
| Reimbursable Expenses Sought in This Application: | \$1,067.59 | |
| Total Amount to Be Paid to Priority Unsecured Creditors: | TBD | |
| Anticipated % Divided to Priority Unsecured Creditors: | TBD | |
| Total To Be Paid to General Unsecured Creditors: | TBD | |
| Anticipated % Dividend to General Unsecured Creditors: | TBD | |
| Date Of Confirmation Hearing | TBD | |
| Indicate Whether the Plan Has Been Confirmed | No | |

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE CHRISTOPHER LOPEZ:

COMES NOW Jordan & Ortiz, P.C. (the “Applicant”) and files this First Interim Application (the “Application”) for interim approval of all of Applicant’s fees in the total amount of \$243,622.50 and reimbursement of all expenses totaling \$1,067.59 incurred during its employment as counsel to Alexander E. Jones (the “Debtor”) from December 1, 2022 through May 15, 2023 (the “Interim Period”). In support of this Application, the Applicant respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference from the United States District Court for the Southern District of Texas. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicate for the relief sought herein is 11 U.S.C. §§ 330 and 331, Federal Rule of Bankruptcy Procedure 2016(a), and the Local Rules of this Court.

**RETENTION OF APPLICANT AND PRIOR
COMPENSATION BACKGROUND**

3. On December 2, 2022 (the “Petition Date”), Alexander E. Jones (the “Debtor”) filed with this Court a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

4. On December 21, 2022, the Debtor filed its Application for Entry of Order Authorizing the Retention and Employment of Jordan & Ortiz, P.C. as Debtor Co-Counsel Effective as of the Petition Date [ECF #71]. On January 20, 2023, the Court entered the Retention Order of J&O as Bankruptcy Co-Counsel for the Debtor [ECF #105].

5. On January 20, 2023, the Court entered its Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for

Chapter 11 Professionals [ECF #106] (“Interim Compensation Order”) permitting Applicant to receive payment of 80% of fees and 100% of expenses. Pursuant to the Interim Compensation Order, Applicant has received periodic payments on monthly fee statements as set forth below:

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|--------------------|---------------------|---------------------|-------------|-----------------|----------------------|-----------------------|------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| TOTAL | | | | \$751.89 | \$204,264.39 | -\$146,790.16 | \$57,474.23 |

6. This is Applicant’s First Interim Application. This Application includes fees and expenses incurred during the entire period of Applicant’s engagement from December 2, 2023 through May 15, 2023.

7. These services were rendered, and expenses incurred during Applicant’s representation of the Debtor in this case. Applicant believes such fees and expenses were reasonable, necessary, and appropriate, given the circumstances.

NATURE AND EXTEND OF LEGAL SERVICES PROVIDED

8. Applicant has provided extensive legal services to the Debtor during the five (5) months comprising the Interim Period. Attached to this Application as Exhibit “A” are records of the time keeping entries during the Interim Period generated by Applicant’s personnel who have worked on this engagement (the “Invoice”). These entries provide detailed descriptions of Applicant’s services on the Debtor’s behalf during the Interim Period.

9. The Invoices also specify each attorney who provided compensable services during the Interim Period. Specifically, the Invoices identify the person providing the service, as well as the following: (1) that person’s individual billing rate and (2) the total number of hours expended by that person.

10. Applicant has broken down its legal services rendered according to the project categories propounded by the Guidelines of the Office of the United States Trustee. The pertinent project categories are:

- Case Administration
- Asset Analysis and Recovery
- Asset Disposition
- Relief from Stay/Adequate Protection Proceedings
- Meetings of and Communications with Creditors
- Fee/Employment Applications
- Fee/Employment Objections
- Avoidance Action Analysis
- Assumption/Rejection of Leases and Contracts
- Other Contested Matters (excluding assumption/rejection motions_
- Business Operations
- Employee Benefits/Pensions
- Financing/Cash Collections
- Tax Issues
- Real Estate
- Board of Directors Matters
- Claims Administration and Objections
- Plan and Disclosure Statement (including Business Plan)
- General Bankruptcy Advice/Opinions
- Restructurings

11. The figures for the time and amounts billed per project category cover the Interim Period. The following chart generally describes the services rendered by Applicant to the Debtor in each of the relevant project categories, with more additional detail provided by in Exhibit “A”:

| FEES INCURRED IN INTERIM PERIOD | | |
|--|--------------|-------------|
| CATEGORIES | HOURS | FEES |
| B110 Case Administration | 80.2 | \$47,522.50 |
| B120 Asset Analysis and Recovery | 32.6 | \$19,175.00 |
| B130 Asset Disposition | 1.1 | \$660.00 |
| B140 Relief from Stay/Adequate Protection | 7.1 | \$4,260.00 |
| B150 Meetings of & Communications with Creditors | 3.5 | \$1,320.00 |
| B160 Fee/Employment Applications | 51.60 | \$24,415.00 |
| B170 Fee/Employment Objections | 7.2 | \$4,320.00 |
| B180 Avoidance Action Analysis | 5.4 | \$3,240.00 |

| | | |
|--|---------------|---------------------|
| B185 Assumption/Rejection of Executory Contracts | 12.2 | \$7,320.00 |
| B190 Other Contested Matters | 132.60 | \$78,350.00 |
| B195 Non-Working Travel | 2.6 | \$1,560.00 |
| B210 Business Operations | 57.40 | \$34,440.00 |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | 0.3 | \$180.00 |
| B250 Real Estate | 0.4 | \$240.00 |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 13.5 | \$8,100.00 |
| B320 Plan and Disclosure Statement | 4.0 | \$2,400.00 |
| B410 General Bankruptcy Advice/Opinions | 7.9 | \$4,740.00 |
| B420 Restructurings | 2.3 | \$1,380.00 |
| TOTALS: | 421.90 | \$243,622.50 |

REQUEST FOR REIMBURSEMENT OF EXPENSES INCURRED

12. While providing legal services to the Debtor, Applicant incurred certain reasonable and necessary out-of-pocket expenses while representing the Debtor. A detailed record of these expenses is included in the Invoice. Expenses were billed at actual cost. Applicant does not charge for long distance telephone, outgoing faxes, and in-house charges for copying and postage. Outside copies and postage are billed the rate by the vendor. Applicant has made no request for general overhead expenses.

13. Applicant's post-petition expenses are separated into relevant categories as set forth in the table below, with additional detail set forth in Exhibit "A".

| EXPENSE | AMOUNT |
|---------------------------|-------------------|
| Court Fees | \$650.88 |
| Printing | \$7.30 |
| Research | \$68.52 |
| Meals (Out of Town Attys) | \$325.89 |
| Parking | \$15.00 |
| TOTAL | \$1,067.59 |

14. Applicant believes that expense request is reasonable, appropriate, and necessary and requests that the Court grant it reimbursement for \$1,067.59 in reimbursable expenses incurred during the Interim Period by Applicant on the Debtor's behalf.

FACTORS AFFECTING COMPENSATION

15. Courts recognize that factors other than the number of hours spent and the hourly rate normally charged may be considered in fixing the amount of reasonable attorneys' fees to be awarded in a bankruptcy proceeding. Such factors are set forth in, *In re First Colonial Corporation of America*, 544 F.2d 1291 (5th Cir. 1977) and *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974). One or more of these Johnson factors may serve as a basis for enhancing the hourly rate which might otherwise be allowed. *Wolf v. Frank*, 555 F.2d 1213 (5th Cir. 1987). The Johnson factors are discussed in further detail below.

A. Time and Labor Required. Exhibit A lists in detail all the work performed for which compensation is sought. Time entries are broken out by project categories. The date the services were rendered, the individual performing such services, a description of the services, and the time expended are all detailed. Applicant believes that such detail establishes that its request for compensation is reasonable. All the services specified were actual and necessary for the Debtor to perform its statutory duties.

B. Novelty and Difficulty. As set forth in greater detail in Exhibit A, this case has involved a number of challenging legal and operational issues. The pending Sandy Hook Litigation presented unique issues and hurdles to overcome to preserve the Debtor's operations and develop a path towards reorganization. Applicant has faced a faced several difficult and complex legal issues, including:

- Work on transition of new counsel and furnishing documents and past strategy issues and problems to aid new counsel to engage and to assist selected Financial Advisors to engage;
- Work on financial information to aid in preparation of statements and schedules involving bank accounts, trust accounts, terminating the 2022 Appeal Trust and dealing with the 2022 Litigation Trust; activities with PQPR and its counsel; asset locations and claims history and analysis;
- Advising Debtor regarding issues of full disclosures; issues of financial transactions disclosures; issues of historical statements to be corrected as misstatements of counsel for Sandy Hook Plaintiffs and dealing with contributions of debtor to FSS to offset sharing of legal fees and enforcement of the statutory and contractual indemnification of defense costs for employment related litigation (primarily Sandy Hook Plaintiffs);
- Work on outline for Judge Isgur mediation and to aid in response and answer to the two Adversary Proceedings by Sandy Hook Plaintiffs, including whether the claims are personal injury tort claims under 28 U.S.C. § 157(d); nature of state court standard of proof (preponderance or clear and convincing); nature of default and how mis-applied to causation and damages; multiple trial and appellate issues; work with co-counsel in preparing outline of defenses and research to support defenses; assisting in obtaining appellate records from appellate counsel;
- Advising the Debtor with respect to the Tort Committee Motion in FSS to revoke the Subchapter V chapter 11 election and the uncertainty of issues surrounding Subchapter V of chapter 11 and impact on Debtor's case and the various 2004 notices for document examination and debtor examination and advice regarding the Sub Chapter V Trustee's report and need for clarification of supplemental matters;
- Prepare and publish the response to the Texas Plaintiffs' claim of Debtor's purported misstatements in regard to trial testimony and trial conversations with Texas Sandy Hook Plaintiffs, prepare video for publication and furnish video to news media for airing, including Piers Morgan for airing.
- Coordinating with the financial advisors ("FAs") to supply history, data, and information to aid in preparation of both schedules and statements as well as financial disclosures from the Debtor incomplete books and records to distill information necessary to complete disclosures for both bankruptcy court and the mediation;
- Work on issues of salary reduction and issues of employment agreement to deal with the allowance of indemnification provided therein, outside work as allowed therein, and provisions for exemption of salary to annuities; review and comment on proposed employment agreement and indemnification;

- Work on presentation to bankruptcy court regarding prior mis-statements, including allegation of \$50M+ in draws from 2020 or 2018 and prepare finished version of chart illustrating salary of approximately \$2.0M to \$2.2M from fiscal 2014 to 2022; chart showing contributions by Debtor to FSS in 2022 of approximately \$10M to support the continued ability of FSS to operate, including debtors use of a majority of \$3.2M in homestead sale proceeds contributed to FSS and use of \$8M in Bitcoin contributions to debtors Bitcoin wallet paid over to FSS, in addition to financing of consigned Platinum products to allow FSS sales to continue and contributions and advance to FSS initially to ship large backlog of paid for shipments as a result of FSS CRO understatement in his original budget for re-ordering and shipping of products;
- Work with Debtor in dealings with third parties and issues including ESG and Midmountain issues, including work on documents and evidence of full and timely disclosures of activities or potential activities and related issues;
- Work with the Debtor and co-counsel in addressing the numerous emergencies arising related to the Debtor's daily business operations, fulfillment of orders, procurement of new products, management of inventory, and analyzing with the replacement CRO financial records and projections to determine viable business plans in the context of the chapter 11 case.

C. Skill Required to Perform the Legal Services Properly. Bankruptcy is a specialized area of federal practice, requiring knowledge of the Bankruptcy Code and other related state and federal statutes and precedent. It also requires a working knowledge of a number of other areas of complicated legal issues, many of which were on an expedited basis and required a substantial amount of skill. The Court is familiar with the extensive emergency hearings, from the first-day motions to the motions to approve and modify the use of FSS cash collateral to the motions for relief from stay and various other motions.

D. Customary Fee. The hourly rates for each professional are summarized above and in **Exhibit "A"** filed in support of this Application. The rates for bankruptcy attorneys reflect the usual rates charged by the Applicant. The hourly rates requested by Applicant compare favorably with average costs for similar legal services provided by law firms representing debtors in chapter

11 cases involving the level of sophistication required in this case. Applicant's rates are significantly lower than the rates charged by other professionals who have appeared in this case.

E. Whether the Fee is Fixed or Contingent. Applicant's fee is neither fixed nor contingent, other than the contingency of court-allowance and available assets to pay professionals. It is based upon the actual total number of hours worked plus the actual costs incurred.

F. Amount Involved and Results Obtained. Exhibit "A" details Applicant's work during the Interim Period. The dates such services were rendered, the individual performing such services, descriptions of the services and the time expended are all detailed. Applicant believes that such information establishes that its requested compensation is reasonable.

G. Experience, Reputation, and Ability of the Attorneys. Mr. Jordan has regularly appeared in significant representations over many years, including bankruptcy cases throughout Texas and the United States and has confirmed plans reorganizing over \$6 billion in claims. Mr. Jordan has fifty years of experience focusing on bankruptcy matters and has a positive reputation in the business and legal community. He is Board Certified in Business Bankruptcy Law by both the State of Texas and the American Bankruptcy Institute, from the first year each respective board certification was offered to Texas counsel. He is recognized among the best lawyers in Texas by Best Lawyers every year since 1990, AV rated every year since 1978 and by Texas Monthly "Super Lawyer" in business bankruptcy for each year published beginning in 2003.

H. "Undesirability" of Case. Representation of the Debtor in this chapter 11 case was undesirable. The Debtor's is a nationally known, and controversial figure and the subject of public ire, including frequent threats to his and his family safety. Further, given the contentious

nature of the Sandy Hook Litigation both by lawyers and the courts and the treatment of the underlying claims, even matters that should be easily agreed are fiercely contested.

I. Awards in Similar Cases. Based on Applicant's experience in the Texas legal market and throughout the country, Applicant's fees are lower than the fees allowed to similarly qualified counsel in proceedings of similar scope for the services rendered and results obtained.

RESULTS OBTAINED

16. Applicant offers the following synopsis of its significant efforts on behalf of the Debtor to date:

a. **Case Administration** – Applicant aided co-counsel and the FAs in building the base of information and guiding the Debtor through the administrative aspects of a bankruptcy case. Working with the Debtor and co-counsel, Applicant has overcome obstacles presented by the state of the Debtor's books and records and dealing with significant mis-information and mis-interpretation of information, to insure timely and most importantly, accurate compliance with the fiduciary duties of a debtor, the full disclosure of the debtors past and current financial and personal transactions, his monthly needs in light of his reduced salary and significant contributions to FSS to allow its continued operations and meeting its operating reporting requirements and obtained necessary Court approval to ensure post-bankruptcy continuity of the debtor's and FSS's operations. The work toward a potential resolution of the Sandy Hook Judgment Claims and the work to assist the appellate lawyers in understanding the bankruptcy court's claims objection process, claims estimation process, the impact of discovery default judgments and the application by the trial courts, rulings permitting, for example, double hearsay as well as testimony by experts testifying to a jury that the Debtors' combined net worth exceeded \$250,000,000, and the resulting actual and punitive damages resulting.

b. **Experience in Fee/Employment Applications and Objections.**

Applicant has prosecuted in bankruptcy cases applications to employ multiple special counsel necessary to defense of state court lawsuits and to prosecute appeals of the resulting judgments, many of those applications were contested. In addition to applications to retain professionals for the Debtor, numerous applications have been filed for the retention of professionals including in the related FSS bankruptcy case.

c. **Assumption and Rejection of Leases and Contract** – Applicant has filed

and prosecuted multiple motions to reject certain contracts and leases and, in this case, reviewed and commented on the several rejection motions for relationships or services no longer necessary to the Debtor’s operations. Applicant has also analyzed, along with co-counsel, other contracts and leases and attended to termination under the terms of the contracts.

d. **Business Operations** – Applicant has assisted the Debtor in evaluating

existing and prospective business opportunities with counterparties regarding inventory purchasing, consignment sales to FSS, financing of product fulfillment at FSS, as well as issues of credit card processing, among others. In addition, upon disqualification of the initial CRO, Debtor had no management in place. Applicant was instrumental in stabilizing the Debtor’s operations until a replacement CRO could be identified and retained.

e. **Financing** - These services primarily relate to the funding of the initial

operations of FSS in its bankruptcy case; the funding of the \$1 million sanction awarded to the Texas Plaintiffs in order to be allowed to go to trial and the strategy concerning same; Debtor’s requests for salary reinstatement through use of the FSS cash collateral and contributions addressing issues in the Debtor’s fulfillment of orders to allow its continued operation. As the result of these contributions of funds and consignment inventor by the Debtor FSS was able to

obtain use of cash collateral on an interim basis and continuing through nine interim cash collateral orders.

f. **Litigation** – The services provided by Applicant to the Debtor related to the mediation and appeals of the Sandy Hook Litigation and the work to prepare for both mediation and actual defense of the claims filed significant work toward the actual defense of the claims, the effort to settle the Sandy Hook Judgment and determine the claims analysis for both settlement purposes, and if unsuccessful, for objections to the Sandy Hook claims, the appeal positions taken by the appellate lawyers as relates to the bankruptcy claims objections, and work toward defeating the claims of any collateral estoppel of the Sandy Hook judgments to allow determination in the bankruptcy court or estimation as the case may be.

g. **Meetings and Communications with Creditors** – Applicant has assisted in co-counsel’s lead in communication with all constituents as well as the mediator in the regular and frequent communications with the Sub-Chapter V Trustee and counsel, the U.S. Trustee’s office, as well as counsel for PQPR, counsel for Free Speech Systems and counsel for the Sandy Hook and Connecticut Plaintiffs.

h. **Plan**–The Plan has not been finalized but part of the mediation process and will be likely promptly filed following the outcome of the mediation.

17. Other bankruptcy practitioners involved in cases of comparable size and complexity regularly charge hourly rates ranging from \$675.00 to over \$800 per hour. Applicant’s approved hourly rate at \$600 in this case is meaningfully lower than the lowest rate in that range. Based upon the services described and the results obtained, the fees requested in this Application are fair and reasonable.

CONCLUSION

18. Pursuant to this Interim Application, Applicant seeks approval on an interim basis of (i) compensation of fees in the total sum of \$243,622.50 and (ii) reimbursement of expenses in the total sum of \$1,067.59. Applicant requests interim approval and payment of all approved, accrued, and unpaid fees and expenses for the Interim Period.

PRAYER

19. WHEREFORE, Applicant respectfully prays that the Court enter an order (i) approving this Interim Application; (ii) allowing, on an interim basis, the reasonable attorney fees and expenses claimed herein as allowed administrative expenses of the Debtor's estate; (iii) authorizing and directing the Debtor to promptly pay the remaining balance of approved amounts to Applicant; and (iv) granting such other and further relief to which Applicant is justly entitled.

Respectfully submitted May 29, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

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Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on May 29, 2023, true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system as follows.

Raymond William Battaglia on behalf of Creditor Free Speech Systems, LLC
rbattagliaw@outlook.com, rwbresolve@gmail.com

Marty L Brimmage on behalf of Creditors Carlee Soto Parisi, Carlos M Soto, Creditor Committee Official Committee Of Unsecured Creditors, David Wheeler, Donna Soto, Francine Wheeler, Ian Hockley, Jacqueline Barden, Jennifer Hensel, Jillian Soto-Marino, Leonard Pozner, Marcel Fontaine, Mark Barden, Neil Heslin, Nicole Hockley, Robert Parker, Scarlett Lewis, Veronique De La Rosa, William Aldenberg, William Sherlach
mbrimmage@akingump.com, imonreal@akingump.com; bkemp@akingump.com; apraestholm@akingump.com; txdocketing@akingump.com

Ryan E Chapple on behalf of Creditors Carlee Soto Parisi, Carlos M Soto, David Wheeler, Donna Soto, Francine Wheeler, Ian Hockley, Jacqueline Barden, Jennifer Hensel, Jillian Soto-Marino, Mark Barden, Nicole Hockley, Richard M. Coan, Robert Parker, William Aldenberg, William Sherlach
rchapple@cstrial.com, aprentice@cstrial.com

Vickie L Driver on behalf of Creditor Free Speech Systems, LLC and Debtor Alexander E. Jones
Vickie.Driver@crowedunlevy.com, elisa.weaver@crowedunlevy.com; ecf@crowedunlevy.com

Elizabeth Carol Freeman on behalf of Interested Party Melissa A Haselden
liz@lizfreemanlaw.com, kgradney@jw.com; dtrevino@jw.com; jpupo@jw.com; JacksonWalkerLP@jubileebk.net

Jennifer Jaye Hardy on behalf of Creditors Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis, Veronique De La Rosa
jhardy2@willkie.com, mao@willkie.com

Melissa A Haselden
mhaselden@haseldenfarrow.com, haseldenbankruptcytrustee@gmail.com; mhaselden@ecf.axosfs.com; haselden.melissaa.r104367@notify.bestcase.com

Nicholas Lawson on behalf of Creditors Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis, Veronique De La Rosa
nick.lawson@mhllp.com, patricia.flores@mhllp.com

John D Malone on behalf of Creditor Security Bank of Texas
myra@johnmalonepc.com, myra@johnmalonepc.com

Jarrold B. Martin on behalf of Creditors Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis, Veronique De La Rosa

jarrod.martin@chamberlainlaw.com, Lara.Coleman@chamberlainlaw.com; atty_jmartin@bluestylus.com; valerie.herrera@chamberlainlaw.com

Avi Moshenberg on behalf of Creditors Leonard Pozner, Marcel Fontaine, Neil Heslin, Creditor Scarlett Lewis, Veronique De La Rosa

avi.moshenberg@mhllp.com, patricia.flores@mhllp.com

Ha Minh Nguyen on behalf of U.S. Trustee US Trustee

ha.nguyen@usdoj.gov

Johnie J Patterson on behalf of Creditor Elevated Solutions Group, LLC

wandp.ecf@gmail.com; WalkerPatterson@jubileebk.net; wp@ecf.courtdrive.com

Bradley J. Reeves on behalf of Creditor Reeves Law, PLLC

bradley.reeves@pillsburylaw.com

Stephen A Roberts on behalf of Interested Party David Ross Jones

sroberts@srobertslawfirm.com, 1222805420@filings.docketbird.com

Jayson B. Ruff on behalf of U.S. Trustee US Trustee

jayson.b.ruff@usdoj.gov

Jason Starks on behalf of Creditor Travis County

bkecf@traviscountytexas.gov

Christina Walton Stephenson on behalf of Debtor Alexander E. Jones

Crissie.Stephenson@crowedunlevy.com, elisa.weaver@crowedunlevy.com; ecf@crowedunlevy.com

US Trustee

USTPRegion07.HU.ECF@USDOJ.GOV

Yoshie Valadez on behalf of Creditor Bank of America N.A.

mhtbkanhssselfilings@mccarthyholthus.com, yvaladez@mccarthyholthus.com

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

FEE STATEMENTS

500 N. SHORELINE BLVD, SUITE 900
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
January 27, 2023
Account No: 5481-002000M
Statement No: 922199

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|--|-------|
| 12/02/2022 | CRM | B110 | A103 | Draft/revise notice of appearance for Shelby Jordan as counsel for Alex Jones and file same. | 0.50 |
| | SAJ | B110 | A108 | Conference with C&D on all pending issues of filing and emails discussing filing and review final documents and office conference with client for final approval (3.4); telephone conference with client and in office regarding filing approval (1.2); telephone conference with client and in office regarding filing and filing statements and schedules (0.2); work on statement to employees regarding Ch 11 filing (0.3); work on audience statement for TAJ show (0.1); discuss status of filing of notice an initial status conference and notices (work on matrix issues and parties in interest) with client appearing (0.2); work on gathering all documents, scheduling Monday for meeting with CRO and parties having books and records (0.4); telephone meeting with Bob Roe (0.3); work on documents for Monday schedule for meeting with co-counsel in Austin (0.3). | 6.20 |
| | SAJ | B190 | A107 | Conference with Pattis regarding status of judgment and appellate timing (0.6); receive and review new Conn pleadings and emails to and from Texas trial counsel (0.4); work on conflicts of law and conflicts of threatened sua sponte seizure over parties not before the Conn court (Jones affiliates as "property of the estate") (0.8); work on notice of auto stay regarding entry of agreed lift stay to coordinate with FSS and its agreed lift stay to coordinate appellate timelines and deadlines (0.3). | 2.10 |
| 12/03/2022 | SAJ | B110 | A103 | Work on draft V1 and V2 of Debtor's Initial Status Report (2.2); emails to new CRO, co-counsel regarding Monday schedule and meeting arranged for preparation of accounting and schedules and for initial status report and initial status conference with Court (0.3); review recent new quotes from Plaintiffs' counsel for appeal issues (0.2); begin to work on issues of debtor pre-petition draws and asset schedules for net worth (2.1). | 4.80 |

JONES, ALEX

Account No: 5481-002000M
Statement No: 922199

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|--|-------|
| 12/04/2022 | SAJ | B410 | A106 | Meeting with client to work on issues regarding all bank accounts and meeting with PQPR to understand access and working relationship to all accounts (1.0); call to ESG regarding status and timing of post-petition work (0.2); work on issues of DIP conduct and accounting with client (0.4) | 1.60 |
| | SAJ | B120 | A104 | Continue to work on organizing assets and affiliate entities and affiliate entities for new CRO and gather information on all affiliate entities transactions and compare to discovery/deposition review to assure thoroughness. | 2.00 |
| | SAJ | B310 | A103 | Work on claims bar date and circulate to co-counsel with proposed order (1.3); work on claims analysis issues and plan confirmation issues (0.6); estimation and claims bar dates process and procedures (0.2); begin work on status report for court on administrative claims of debtor due from FSS (0.2). | 2.30 |
| | SAJ | B210 | A108 | Conference with PQPR regarding all affiliate and related bank accounts and business records. | 0.60 |
| 12/05/2022 | SAJ | B110 | A107 | Conference with co-counsel on all asset issues and accounting issues involving schedules and statements of affairs, listing of assets including opportunities (1.6); download multiple files and discuss with CRO team regarding initial accounting and analysis of actual net worth, schedules or draws (checking for actual business expenses designated as a draw (0.2); prepare edits to initial status conference reports and circulate (0.3); work on demonstrative of draws and average draws per year (0.3). | 2.40 |
| | SAJ | B210 | A106 | Conference with client regarding bank accounts (0.4); call and arrange appointment and conference call with Bob Roe regarding meeting schedule tomorrow and accounting issues to meet with CRO team (0.3) | 0.70 |
| | SAJ | B410 | A106 | Conference with client regarding all current operations and issues of DIP and how to deal with post-petition ESG agency and accomplish regarding past, current and future investment in inventory purchases for consignment to FSS (1.2); how to organize bank accounts and how to insure accurate inventory for storage rooms with property of the estate (0.3); work on scheduling inventory and appraisal issues and set up meeting with Debtor and new CRO;(0.5) | 2.00 |
| | SAJ | B185 | A107 | Conference with co-counsel regarding salary contract, indemnity and motion to assume or reject executory contracts including employment agreement evidence (0.2); conference with Battaglia regarding salary budget expenses adjustment and timing and indemnity agreement (0.2). | 0.40 |
| | SAJ | B190 | A103 | Work on pleading for estimation of claims (0.4); prepare and | |

Bankruptcy

| | | | | Hours |
|--|-----|------|---|-------|
| circulate memo in connection with issues of discharge (0.2). | | | | 0.60 |
| | SAJ | B190 | A104 Work on a respond to suggestion of bankruptcy filed in Travis County and pull research and update holding such filing not an "appearance" in the removed case (0.5); pull research and send to parties and Plaintiffs' counsel that notice only is required to invoke the automatic stay (0.6); conference with Andino Reynal regarding his appellate issues (0.3). | 1.40 |
| | SAJ | B185 | A106 Conference with client regarding status of expectancy. | 0.40 |
| 12/06/2022 | SAJ | B110 | A106 Meeting with client and CRO and meeting with co-counsel and CRO and conference with client in office regarding handling and accounting for all cash, handling payment of bills and accurate reporting of all credit card charges (2.4); conf with client re: handling contracts income and new contract opportunities (0.6); conference with Bob Roe regarding historical operations, historical records and other accounting issues (0.7); review and circulate email and memo on Rule 2019(b) BRP to require all creditor counsel representing more than one client to file verified statement (0.2) | 3.90 |
| | SAJ | B120 | A103 Work on debtor asset summaries and conference with CRO regarding appraisals to the Ranch and Lake Travis house. | 0.20 |
| | SAJ | B140 | A107 Conference with co-counsel regarding motion for relief from stay regarding FSS stay through entry of judgment and impact on creating two appeal proceedings. | 0.50 |
| | SAJ | B185 | A104 Work on issues of default by FSS and enforcement of Debtor's employment contract with FSS (0.4); review draft for edits; conference with debtor (0.4). | 0.80 |
| | SAJ | B190 | A103 Circulate detailed memo on 5th Circuit case regarding final judgments only and pull authority that a Federal court case filing included a bankruptcy or a contested matter objection to a claim or seeking estimation of claims and determining discharge actions (1.7). Begin outline for mediation statement including these points (1.0). | 2.70 |
| | SAJ | B190 | A104 Work on and research appellate issues for state court stay issues (0.4); circulate to co counsel along with research on filing suggestion of bankruptcy and non-appearance in case (0.3); pull and forward case for violation of auto stay for any non-ministerial action by court or parties and liability of counsel in removal (0.4). | 1.10 |
| 12/07/2022 | CRM | B190 | A109 Prepare, appear (remotely) and attend status conference. | 0.60 |
| | SAJ | B110 | A109 Houston meeting with Liz Freeman and meeting with co-counsel to prepare and attend hearing on initial status | |

JONES, ALEX

Account No: 5481-002000M
Statement No: 922199

Bankruptcy

| | | | | Hours |
|------------|-----|------|--|-------|
| | | | conference (3.0); conference with client regarding status report (no travel included) (0.2); post hearing telephone conference with client re: hearing outcome (0.1). | 3.30 |
| | SAJ | B310 | A104 Research and memo preparation regarding standard of proof and mediation statement inclusion (1.4); analysis of each cause of action in Texas and Conn compensatory damages and default for each of Texas and Conn punitive damages standard of proof (1.5); impact of limitations on standard of proof (0.2). | 3.10 |
| | SAJ | B195 | A109 Trip to Houston to attend status conference (billed at half). | 2.60 |
| 12/08/2022 | SAJ | B110 | A106 Conference with client regarding status of donations accounts and assure account handling and deposit in DIP account. | 0.70 |
| | SAJ | B120 | A104 Continue to review of documents for schedules and statements (0.8); emails to new CRO and two meeting with debtor to organize and document various assets and asset opportunities with "brand" and with affiliates (1.2). | 2.00 |
| | SAJ | B140 | A107 Conference with Battaglia and work on issues of appeal and entry of judgments coordinated between the two debtors to avoid two-track appeal in same case. | 0.80 |
| | SAJ | B190 | A107 Conference with Norm Pattis regarding status of appeal issues for Conn appeal and status of retainer and costs to be incurred. | 0.40 |
| | SAJ | B110 | A107 Conference with Norm Pattis regarding status of contribution account and location and turn over to estate. | 0.70 |
| | SAJ | B210 | A103 Work on DIP budget issues and stop charges by FSS to DIP account for internet access. | 0.70 |
| | SAJ | B110 | A107 Email to debtor CRO (0.2); call and emails to co-counsel regarding pull down hearing on salary and prepare for hearings on 16th and 19th and 341 meeting (0.5). | 0.70 |
| 12/09/2022 | SAJ | B110 | A107 Telephone conference with co-counsel to prepare for next week work by CRO with debtor (0.8); memo on discussion re: Friday hearing and planning, strategy, zoom and related issues (0.5). | 1.30 |
| | SAJ | B120 | A104 Work on 2017 to current asset and asset opportunities-transactions for valuation and scheduling. | 1.20 |
| | SAJ | B310 | A103 Prepare V1 mediation memo on claims estimation/dischargeability and full review and determination of non-tort "claims" (Defamation and bankruptcy court's jurisdiction to determine) and intentional infliction as a personal injury claim and work on mediation statement V8 (3.6). | 3.60 |

Bankruptcy

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|------------|-----|------|------|--|-------|
| | SAJ | B190 | A103 | Work on V9 of mediation statement and summary of BR strategy; circulate. | 2.40 |
| 12/10/2022 | SAJ | B190 | A103 | Work on V10 of mediation statement section on summary and strategy of debtor's Chapter 11 case (2.0); incorporate edits and changes from co-counsel (0.2). | 2.20 |
| 12/12/2022 | SAJ | B110 | A106 | Conference with client regarding week scheduling, meeting regarding additional information on assets and transactions (1.0); review of last two depositions referencing assets (.6). | 1.60 |
| | SAJ | B110 | A107 | Conference with Steve Lemmon regarding access to PQPR information (.3); conference with co-counsel regarding same (.4). | 0.70 |
| | SAJ | B190 | A103 | Continue to work on V10 mediation statement and issues to be discussed with mediator (3.2); work on scheduling mediator call and zoom regarding going forward after Plaintiffs mediator meeting and request for conference call with mediator and topics (0.5). | 3.70 |
| 12/13/2022 | SAJ | B120 | A107 | Conference with co-counsel regarding meeting with debtor and asset analysis (0.5); work on recovery of deposition of debtor regarding testimony about assets, property, affiliates. (0.5) | 1.00 |
| | SAJ | B190 | A103 | Continue to work on mediation statement (2.2); conference with Pattis regarding depositions and current status of issues (0.3); continue work on research mediation research and schedule zoom conference with mediator and emails to Ray Battaglia and co-counsel regarding timing and attendance (0.8); prep and attend zoom conference with mediator (0.8). | 4.10 |
| 12/14/2022 | SAJ | B110 | A106 | Conference with client regarding hacking and disclosures and discuss with client and Battaglia seeking bankruptcy court relief for hacked and stolen confidential information (0.6); determine damages, if any, by third parties attempting de-platforming as a violation of the automatic stay (0.8). | 0.80 |
| | SAJ | B110 | A107 | Conference with co-counsel and conference with consignment lender rep on timing of payment (0.5); conference with FSS counsel and request conference with FSS CRO (0.3). | 0.80 |
| | SAJ | B190 | A107 | Discuss with co-counsel and debtor the appeal strategy and modification to allow appeals to proceed. | 0.30 |
| | SAJ | B120 | A107 | Meeting and discussions continued efforts at asset and liability discovery analysis with co-counsel, financial advisor, debtor. | 1.70 |
| | SAJ | B150 | A104 | Review appointment of creditors committee and compare to memo of Conn v Texas Plaintiffs (circulate). | 0.20 |
| | SAJ | B150 | A106 | Conference with client on committee function, make-up and | |

Bankruptcy

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|------------|-----|------|---|---------------|
| | | | representation. | Hours 0.20 |
| | SAJ | B185 | A103 Work on FSS contracts regarding \$900,000 due debtor from FSS postpetition for the purchase of product to be sold (0.6); work on contracts potential for celebrity endorsements and celebrity endorsements (0.3). | 0.90 |
| | SAJ | B185 | A107 Conference with ESG (.4); review details for third party promoted products (.5). | 0.90 |
| | SAJ | B190 | A103 Continue to work on mediation statement V11 and prepare initial statement for service on mediator. | 2.20 |
| 12/15/2022 | SAJ | B140 | A107 Review and comment on order for lift stay agreement with Akin Gump to coordinate entry of judgments for appeal purposes (0.4); email to Andino regarding attorneys fees and appeals and employment (0.2). | 0.60 |
| | SAJ | B320 | A104 Review and comment on cash collateral and issues of executory contract concerns (0.4); send demonstrative on potential post-petition contracts including celebrity endorsement income and reporting all sources of income in MOR and to estate (0.6). | 1.00 |
| | SAJ | B190 | A103 Draft/revise summary for mediation after conference with mediator (1.2); work on summary "driving issue" in mediation (0.3); secondary issue of claims objections (0.2); and other mediation issues (0.3); begin update to V11 mediaiton statement (0.4). | 2.40 |
| 12/16/2022 | SAJ | B110 | A104 Review/analyze and comment on witness list and related exhibits including new budget and does not deal with salary. | 1.00 |
| | SAJ | B185 | A103 Draft/revise and circulate demonstrative on post petition contract negotiations and request a copy of Celebrity Endorsement contract. | 1.00 |
| | SAJ | B160 | A107 Notice to Norm Pattis (Conn appeal counsel) that fee is likely to be hourly cc: Driver and conference with Pattis. | 0.40 |
| | AO | B110 | A105 Conference with Shelby Jordan regarding preparation for hearing on 12/19 in case Jordan cannot attend. | 0.60 |
| 12/19/2022 | SAJ | B410 | A106 Meeting with client and co-counsel to work on all outstanding administrative and reporting issues dealing with new financial advisors requests (1.0); discuss and review the MOR filings by FSS and discuss the confusing issues created by the delayed accounting and systems of FSS CRO and discuss issues with the FSS CRO Patrick McGill (0.4); call from Ray Battaglia regarding cash collateral in FSS and discuss with client the continued refusal to restore the contract rate salary and alternatives (0.4). | 1.80 |

Bankruptcy

| | | | | Hours |
|------------|-----|------|--|-------|
| | SAJ | B140 | A101 Prepare with client and co-counsel regarding hearings on cash collateral motion and prepare debtor on responses to Court's questions, if nay, at hearing. | 2.60 |
| | SAJ | B140 | A106 Meeting with client and review issue of relief from stay, payment of percent of costs of appeal by this estate and by FSS and discuss reference to appellate counsel and restrictions on fees and alternatives if cash flow cannot be maintained. | 1.00 |
| | SAJ | B160 | A103 Work on Jordan & Ortiz application to employ and prepare for filing. | 0.80 |
| | SAJ | B190 | A103 Finish intro of V12 mediation statement and circulate to co-counsel. | 0.80 |
| | AO | B110 | A105 Attend hearings and prepare memo for circulation to debtor and counsel. | 1.50 |
| | SAJ | B110 | A103 Prepare the initial debtor's conference form and circulate (0.6); prepare and attended with debtor and co-counsel the initial debtor's conference (0.6) | 1.20 |
| 12/20/2022 | SAJ | B210 | A107 Conference regarding FSS and operations for Oct Nov 2022 and discussion of operations and disclosures of extremely confidential information in morning debtor conference regarding impact of confidential disclosures and impact of Debtor's estate by de-platforming (2.0); work on status of FSS and its CRO and decisions to delay operations issues and employment agreement (0.4); requested accounting budgeting of FSS for January and February (0.2). | 2.60 |
| | SAJ | B160 | A103 Prepare final draft of Fee Application and circulate (1.2); work on interim order for fee payments (1.1). | 2.30 |
| | SAJ | B180 | A107 Request FSS action to seek preference payments and issues to be raised in mediation (0.5); discuss and determine whether funding of cash by Jones pre-petition as basis of preference by Jones estate (0.7); research punitive sanctions as a preference payment (0.5). | 1.70 |
| 12/21/2022 | CRM | B160 | A103 Review and revise Shelby Jordan fee application, order and declaration; file and serve same. | 1.00 |
| | SAJ | B210 | A106 Review/analyze email from Zensky regarding donations and email to debtor forwarding Zensky email and work on summary (0.7); conference with debtor and emails to co-counsel on information gathering and outline of response (0.3); review with Pattis donation accounts and accounting (0.2). | 1.20 |

Bankruptcy

| | | | | Hours |
|-----|------|------|--|-------|
| SAJ | B160 | A103 | Finalize and file retention application for Jordan & Ortiz. | 0.80 |
| SAJ | B160 | A106 | Conference with client regarding interim payments and income funding (0.4); emails to co-counsel to prepare FSS form of interim compensation and send word version (0.6). | 1.00 |
| SAJ | B185 | A101 | Work on preparation for hearing on summary of reasons for executory employment contract of Jones with FSS (1.2); send full financial summary of pre-payments by Jones of FSS expenses without reimbursements and work on issues of Jones administrative expense claims of FSS (1.0); send memo on "indemnity" set out in employment agreement and issue of statutory right to indemnity due by FSS (0.2). | 2.40 |
| SAJ | B190 | A103 | Work on mediation issues outline for inclusion in mediation statement V13. | 1.30 |
| SAJ | B310 | A107 | Conference with co-counsel regarding hearing conflict on salary issues and other client mediation (0.7); prepare, research and forward outline of proof on debtor background payments and administrative claims due by FSS to Jones including travel, advances for Conn trial, attorneys retainer for FSS and prior counsel to Info-W, InfoW-Health, Prison Planet and for shipment and fulfillment and consignment purchases, etc. and research on right to indemnity from FSS (2.0). | 2.70 |
| SAJ | B110 | A106 | Review PQPR sales reconciliation and discuss with client issues of accounting and reporting (0.6); discuss status of consignment of Platinum products to be sold by FSS and how disbursements of those proceeds will be handled including ESG agent handling (0.7). | 1.30 |
| SAJ | B110 | A104 | Email and review the notice of hearing docket 76 for assumption/rejection of employment agreement. | 0.30 |
| SAJ | B160 | A103 | Complete declaration of disclosure of fees paid in year before bankruptcy and work on final copies of fee application and final draft of interim fee payments and filing (1.10). | 1.10 |
| SAJ | B190 | A107 | Conference with Norm Pattis regarding appellate points, status of appeal issues and status of notice of appeal post judgment (0.4); edits and thoughts sent to Pattis (0.6). | 1.00 |
| SAJ | B190 | A105 | Conference with client regarding appeal and Texas appellate issues (0.6); receive and review memorandum of decision entered by Judge Belis in Connecticut and discuss with debtor (0.4). | 1.00 |
| SAJ | B190 | A107 | Email to co-counsel regarding Rule 2004 examination and Zensky demands and regarding Rule 2004 notice (0.4); gather and forward to co-counsel the documents previously furnished to the Sub-V Trustee voluntarily marked "Mediation Privileged" | |

Bankruptcy

| | | | | | Hours |
|------------|-----|------|-------|--|-------|
| | | | (1.5) | | 1.80 |
| 12/27/2022 | SAJ | B210 | A107 | Zoom conference call with DIP lender attorney and co-counsel (0.7); review and discuss mediation ordered and the extension of FSS dischargeability deadline and both documents application to this debtor (0.5). | 1.20 |
| | SAJ | B410 | A107 | Email and conference with co-counsel regarding publication of deposition testimony by Plaintiffs and request of Committee Counsel to assist in pulling down. | 0.30 |
| | SAJ | B120 | A104 | Review/analyze and verify return of quitclaim deeds and title to Jones of the Travis Lake House and the Guadalupe County 124 Acres from the 2022 appeal bond trust (0.2); forward to financial officers for inclusion in schedules and verify filing in the deed records for return of assets to the estate (0.4). | 0.60 |
| | SAJ | B160 | A107 | Review email from co-counsel regarding UST question about J&O representation of any parties in interest to Jones "in other matters" and email to co-counsel replying "none" in any matter. | 0.20 |
| | SAJ | B190 | A107 | Email and conference with co-counsel on mediation order that must be approved by Plaintiffs counsel. | 0.30 |
| | SAJ | B310 | A104 | Review/analyze status of loan and debtor's guaranty with security state bank of crawford (0.2); conference with client (0.1); request copies of loan documents and location of loan collateral (Winnebago travel vehicle) (0.1). | 0.40 |
| 12/28/2022 | SAJ | B110 | A103 | Work on outline of issues to consider in salary motion and evidence (0.4); work on issue of confidentiality to avoid matters of production sent to the news and press (0.3); email to and from co-counsel regarding need for confidentiality agreement in response to David Zensky (0.3). | 1.00 |
| | SAJ | B410 | A104 | Review/analyze order on FSS extension of the deadline for dischargeability (0.3); send email to co-counsel regarding preparation for V13 outline of all issues for mediation statement (0.3). | 0.50 |
| | SAJ | B160 | A107 | Research and respond to UST questions about related party of affiliate representation (response, none) review IOLTA and source and use, have conflicts check re-run. | 0.70 |
| | SAJ | B180 | A107 | Emails to co-counsel and Battaglia regarding need to consider bringing the avoidance actions. | 0.60 |
| | SAJ | B190 | A104 | Review/analyze two orders sent by Akin Gump on mediation send edit thoughts to co-counsel (0.3); work on dischargeability research section for mediation statement V14 (0.7). Total Time Billed 1.00 | 1.00 |

Account No: 5481-002000M
 Statement No: 922199

Bankruptcy

| | | | | Hours | | |
|------------|-----|------|------|---|--------|-----------|
| 12/30/2022 | SAJ | B210 | A107 | Conference with co-counsel update and discussion of all pending matters (0.4); email to debtor and call to debtor regarding email questions raised (0.6). | 1.00 | |
| | | | | For Current Services Rendered | 130.60 | 77,362.50 |

| Recapitulation | | | | |
|------------------|------------|--------|----------|-------------|
| Timekeeper | Title | Hours | Rate | Total |
| SHELBY A. JORDAN | Partners | 126.40 | \$600.00 | \$75,840.00 |
| ANTONIO ORTIZ | Partners | 2.10 | 475.00 | 997.50 |
| CHRYSTAL MADDEN | Paralegals | 2.10 | 250.00 | 525.00 |

| | | | | |
|------------|------|------|--|-------------|
| 12/30/2022 | B110 | E111 | 12/5/22 - The Grove - Working lunch for Crissie Stephenson, Vickie Driver, Harold Kessler, Allison Gerard | 126.04 |
| 12/30/2022 | B110 | E111 | 12/6/22 - Panera - Working lunch for Crissie Stephenson, Vickie Driver, Harold Kessler, Bob Schleizer, Shelby Jordan, Allison Gerard | 199.85 |
| 12/31/2022 | B110 | E112 | CSC - Recording Fees for Travis Co and Guadalupe County | 91.98 |
| 12/31/2022 | B110 | E124 | Parking - Hearing in Travis Co | 15.00 |
| 12/31/2022 | B110 | E132 | Bankruptcy Photocopies (.20 per page) | 7.30 |
| 12/31/2022 | B110 | E124 | Computer Research - Lexis | 66.48 |
| | | | Total Expenses | 506.65 |
| | | | Total Current Work | 77,869.15 |
| | | | Balance Due | \$77,869.15 |

Task Code Summary

| | | Fees | Expenses |
|------|--|-----------|----------|
| B110 | Case Administration | 20742.50 | 506.65 |
| B120 | Asset Analysis and Recovery | 5220.00 | 0.00 |
| B140 | Relief from Stay/Adequate Protection Proceedings | 3300.00 | 0.00 |
| B150 | Meetings of and Communications with Creditors | 240.00 | 0.00 |
| B160 | Fee/Employment Applications | 4630.00 | 0.00 |
| B180 | Avoidance Action Analysis | 1380.00 | 0.00 |
| B185 | Assumption/Rejection of Leases and Contracts | 4080.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 19830.00 | 0.00 |
| B195 | Non-Working Travel | 1560.00 | 0.00 |
| B100 | Administration | 60,982.50 | 506.65 |
| B210 | Business Operations | 4800.00 | 0.00 |
| B200 | Operations | 4,800.00 | 0.00 |
| B310 | Claims Administration and Objections | 7260.00 | 0.00 |
| B320 | Plan and Disclosure Statement (including Business Plan) | 600.00 | 0.00 |
| B300 | Claims and Plan | 7,860.00 | 0.00 |

JONES, ALEX

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January 27, 2023

Account No: 5481-002000M
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Bankruptcy

| | | <u>Fees</u> | <u>Expenses</u> |
|------|------------------------------------|-------------|-----------------|
| B410 | General Bankruptcy Advice/Opinions | 3720.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | 3,720.00 | 0.00 |

Your trust account #1 balance is

| | |
|-----------------|--------------|
| Opening Balance | \$146,790.16 |
| Closing Balance | \$146,790.16 |

The entry N/C signifies time spent for which there will be no charge.

500 N. SHORELINE BLVD, SUITE 900
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
February 15, 2023
Account No: 5481-002000M
Statement No: 922213

Bankruptcy

| PREVIOUS BALANCE | | | | | \$77,869.15 |
|------------------|-----|------|------|--|-------------|
| | | | | | Hours |
| 01/01/2023 | SAJ | B210 | A106 | Call to debtor regarding funding of personal expenses and advances from third parties and issues. | 0.30 |
| 01/03/2023 | SAJ | B120 | A107 | Call to counsel Minton regarding divorce documents for Vickie to review (no reply). | 0.30 |
| | SAJ | B185 | A108 | Respond to emails from auditors for information regarding consignment agreement through ESG and FSS and send spreadsheet in native format for review. | 0.40 |
| | SAJ | B190 | A103 | Work on mediation report and update briefing for Isgur statement. | 1.70 |
| | SAJ | B190 | A107 | Conference with Conn appeal counsel Pattis regarding status of appeal and appellate points reviewed. | 0.80 |
| 01/04/2023 | SAJ | B160 | A107 | Review UST questions and request for further information and complete and email to co-counsel with answers, notice to UST that answer will be forwarded. | 1.00 |
| | SAJ | B190 | A103 | Continue to work on mediation report briefing on question of dischargeability (evidentiary burden of proof, default; sanctions denying defenses, etc.). | 1.70 |
| 01/05/2023 | SAJ | B110 | A104 | Review and comment to co-counsel on Stipulation by FSS regarding deadline for dischargeability and application to Debtor's case. | 0.20 |
| | SAJ | B110 | A107 | Emails with co-counsel regarding meeting yesterday with FSS CRO and debtor. | 0.30 |
| | SAJ | B120 | A108 | Review file for notes and records and contact David Jones to obtain copy of the Missouri Trust (.5); email to co-counsel and response email and further search for documents (.5). | 1.00 |
| | SAJ | B160 | A107 | Begin review of Jason Ruff's email attaching comments and | |

Bankruptcy

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| | | | | request on J&O and D&G retention applications (.2); emails to co-counsel to coordinate response and not duplicate efforts (.2). | 0.40 |
| | SAJ | B160 | A103 | Work on supplemental declaration in disclosures as needed regarding transactions, assets and work for affiliates. | 0.60 |
| | SAJ | B190 | A107 | Email to Battaglia (.1); co-counsel regarding status of parties to the mediation and schedule for mediator to contact all parties and form of mediation order (.2). | 0.30 |
| | SAJ | B190 | A104 | Review/analyze and comment on Brauner (.2); summarize mediator's concern about "documents" timing before sending mediation letter (.2). | 0.40 |
| 01/06/2023 | SAJ | B210 | A106 | Email to debtor regarding return to office and meeting to discuss status of all pending matters. | 0.30 |
| | SAJ | B160 | A107 | Email and telephone conference with co-counsel and access to the documents for Missouri Trust funding and related cash use for retainer and work on locating documents. | 1.70 |
| | SAJ | B160 | A109 | Appear for/attend hearings on Kyung and Schwartz. | 0.50 |
| 01/09/2023 | SAJ | B110 | A106 | Call to client regarding reimbursements of out of pocket connecticut expenses and status per co-counsel. | 0.30 |
| | SAJ | B110 | A104 | Review/analyze and comment on Utility Order. | 0.20 |
| | SAJ | B120 | A106 | Emails and call to debtor (.1); email to co-counsel regarding location of motorhome and security bank lien claim (.1); call to David Jones regarding payment (2). | 0.40 |
| | SAJ | B160 | A103 | Review and comment on proposed edits to order on interim fees. | 0.30 |
| 01/10/2023 | SAJ | B160 | A104 | Review and comment on first supplemental declaration for employment of J&O (.3); review C&D supplement and issues with payment of fees from retainer first (.1). | 0.40 |
| | SAJ | B250 | A104 | Review/analyze quitclaim circulation on trust assets returned to estate and work on title issue. | 0.40 |
| 01/11/2023 | CRM | B160 | A103 | Prepare draft of first interim fee application. | 1.50 |
| | SAJ | B150 | A109 | Attend 341 meeting by phone. | 0.60 |
| | SAJ | B150 | A106 | Call to debtor regarding meeting. | 0.20 |
| | SAJ | B120 | A107 | Email to co-counsel regarding motorhome loan paid off and response that debtor began payments (remaining issue-sell motorhome). | 0.30 |

Bankruptcy

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| | SAJ | B190 | A107 | Review and respond to inquiries by Judge Isgur (mediator) for detailed financial information and expectation of completion (.2); email to co-counsel and review and respond and conference with Ray Battaglia regarding FSS response (.2). | 0.40 |
| | SAJ | B310 | A103 | Work on outline of claims objections to the Texas and Conn claims to be filed, including issues raised in appeals and issue of dischargeability. | 1.40 |
| 01/12/2023 | SAJ | B130 | A107 | Conference with co-counsel regarding location of state bank of crawford collateral and listing for sale. | 0.20 |
| | SAJ | B160 | A104 | Review/analyze and comment for filing supplement declaration. | 0.20 |
| | SAJ | B160 | A107 | Email and conference with co-counsel regarding Pattis and Reynal applications and retainer deposits paid. | 0.30 |
| 01/13/2023 | SAJ | B110 | A109 | Plan and attend hearing on motion to reconsider by S&L and Schwartz on FSS and objections filed by Alex Jones. | 1.00 |
| | SAJ | B160 | A107 | Conference with Reynal regarding appeal applicant to represent debtor, Alex Jones (.2); conference regarding entry of order starting appeal time (.1); email to Chris Martin regarding handling Alex Jones appeal (.1). | 0.40 |
| | SAJ | B160 | A107 | Emails to and from co-counsel regarding review and edit Supplement to J&O Application to be employed and declaration. | 0.30 |
| | SAJ | B190 | A107 | Review Rule 2004 Exam to PQPR by Plaintiffs; call to PQPR counsel; email from and to co-counsel. | 0.70 |
| | SAJ | B190 | A108 | Email to and from Judge Isgur regarding mediation and availability of financial documents and discussion with co-counsel. | 0.30 |
| 01/15/2023 | SAJ | B210 | A106 | Conference with debtor regarding status and issues to discuss. | 0.20 |
| 01/16/2023 | CRM | B160 | A103 | Continue to work on first interim fee application. | 0.90 |
| | SAJ | B160 | A107 | Conference with Andino Reynal (.2); conference with Chris Martin (.2); conference with Norm Pattis (.2); email to co-counsel regarding retention agreements for Jones estate with each and status and email from co-counsel review and respond (.1). | 0.70 |
| | SAJ | B130 | A108 | Email from Bob Schleizer regarding Missouri Trust and prepaid alimony for 2023 and pull notes to verify. | 0.20 |
| | SAJ | B130 | A107 | Email from and to co-counsel regarding alimony vs prenuptial. | 0.40 |

Bankruptcy

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| 01/17/2023 | SAJ | B110 | A104 | Review/analyze email 2019 from creditors committee. | 0.20 |
| | SAJ | B110 | A107 | Conference with co-counsel on all pending matters including schedules and research for Missouri Trust and for certain repayments, etc. | 0.70 |
| | SAJ | B160 | A108 | Review and comment on UST comments to the Blackbriar and Kennerly employment applications. | 0.30 |
| 01/18/2023 | SAJ | B110 | A107 | Email from Ray Battaglia regarding cash collateral (.1); call regarding salary and cash collateral budget (.2); review witness and exhibit list (.2). | 0.50 |
| | SAJ | B160 | A107 | Email from Chris Martin and reply (.1); email from Andino Reynal and reply regarding appeal retention (.1); call to Reynal (.2); conference with co-counsel regarding retention and review new list of potential affiliate or related parties conflicts and report none (.3); review Sub-V trustee witness and exhibit list (.1). | 0.80 |
| | SAJ | B170 | A104 | Review/analyze exhibit and witness lists from Lee and Schwartz and compare to objections by Jones to both (.2); review Sandy Hook Plaintiffs, UST and Debtor's Exhibits and Witness List (.2); prepare for hearing (.4) | 0.80 |
| | SAJ | B185 | A104 | Review proposed draft order on executory contracts and comment (.2); review witness and exhibit list for Friday hearing on both executory contract (.2). | 0.40 |
| 01/19/2023 | SAJ | B185 | A104 | Review/analyze amended witness and exhibit lists by Lee and Schwartz. | 0.30 |
| 01/20/2023 | CRM | B160 | A109 | Appear for/attend 1/20 hearings | 1.50 |
| | CRM | B160 | A103 | Revise first fee app in response to interim compensation order and email same. | 1.50 |
| | SAJ | B160 | A109 | Attend hearing on J&O's Application to be employed and conference with co-counsel. | 1.00 |
| | SAJ | B170 | A109 | Attend hearing on Lee and Schwartz motions to reconsider on the objections of Alex Jones and others. | 1.20 |
| 01/21/2023 | SAJ | B210 | A106 | Conference with debtor regarding summary of FSS CRO issues. | 0.70 |
| 01/22/2023 | SAJ | B110 | A106 | Conference with client regarding administrative issues and problems with FSS and issues of the administrative claims this estate has with FSS and CRO and other matters (.5); emails to co-counsel for a Monday zoom or conference call with debtor (.5). | 1.00 |

Bankruptcy

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|------------|-----|------|------|---|-------|
| 01/23/2023 | SAJ | B110 | A108 | Response to Bloomberg call and request for statements, no statement and refer to co-counsel. | 0.20 |
| | SAJ | B110 | A107 | Emails to co-counsel regarding first MOR and meeting with debtor and timing. | 0.30 |
| | SAJ | B160 | A103 | Work on first monthly fee statement pursuant to Court's Interim Fee Order, including Exhibit A. | 0.80 |
| | SAJ | B160 | A107 | Conference with Andino Reynal and Chris Martin regarding Jones estate appeal lawyer fee agreements (.4); email to co-counsel (.1). | 0.50 |
| 01/24/2023 | SAJ | B210 | A106 | Notice of debtor's interview and claim by Plaintiffs regarding new cause of action and new claim to damages and conference with debtor. | 1.40 |
| | SAJ | B210 | A107 | Review full details of interview and demand (.6); telephone conference with Andino Reynal and status of record references made in interview (.4). | 1.00 |
| | SAJ | B210 | A107 | Emails to co-counsel regarding potential issues raised by email demand. | 0.20 |
| | SAJ | B210 | A106 | Second conference with debtor about pulled video footage and confirmation. | 0.40 |
| | SAJ | B160 | A107 | Continue issue of fee agreements for Jones appeal (Chris Martin counsel) (.2); conference with Chris Martin and Andino Reynal (.4). | 0.60 |
| 01/25/2023 | SAJ | B110 | A104 | Review details of first MOR by debtor and email to co-counsel. | 0.30 |
| | SAJ | B110 | A106 | Conference with client regarding MOR and delivery of native format draw spreadsheets and agree no need to attend Thursday meeting. | 0.40 |
| | SAJ | B210 | A104 | Review and comment on issues of failure of McGill to produce projections for sales, expenses in email from co-counsel. | 0.30 |
| | SAJ | B210 | A107 | Conference with Battaglia and email regarding draws of Alex Jones accounting. | 0.30 |
| | SAJ | B160 | A107 | Call and email from Andino Reynal as appeal counsel in Texas cases and email to co-counsel regarding same. | 0.30 |
| | SAJ | B160 | A104 | Review drafts of retention agreements for Reynal and Martin. | 0.30 |
| | SAJ | B160 | A107 | Email and call to client regarding signature on Martin retention agreement. | 0.20 |
| | SAJ | B160 | A107 | Email to co-counsel regarding conversation with Chris Martin to | |

Bankruptcy

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|------------|-----|------|------|--|-------|--|-----------|
| | | | | assure proper accounting of \$100k retainer to Martin's firm from only Alex Jones (and not FSS). | 0.40 | | |
| | SAJ | B190 | A107 | Email from Battaglia regarding discovery and documents and discovery issues. | 0.20 | | |
| | SAJ | B190 | A107 | Email to and from co-counsel and discuss prior mediation privileged documents to Sub-V trustee. | 0.20 | | |
| 01/26/2023 | CRM | B160 | A103 | Final review and revisions to First Monthly Fee Statement from Shelby Jordan and file same and email to all notice parties. | 0.50 | | |
| | SAJ | B190 | A107 | Review PQPR discovery issues and privileged documents of FSS or Jones and conference with Lemmon and agree production must include mediation privilege marking. | 0.50 | | |
| | SAJ | B190 | A107 | Email to co-counsel regarding marking mediation privilege for production and respond to issues of production by co-counsel. | 0.20 | | |
| 01/27/2023 | SAJ | B210 | A107 | Emails to and from co-counsel regarding meeting on current topics. | 0.30 | | |
| | SAJ | B170 | A103 | Work on december fee statement and work on edits to notice of fees and motion for approval of interim fees. | 1.10 | | |
| 01/30/2023 | SAJ | B160 | A103 | Work on monthly fee application and breakdown on fee application for December 2022. | 2.00 | | |
| 01/31/2023 | CRM | B160 | A103 | Revise First Monthly Invoice per co-counsel email on bulk billing (.9); discuss with Shelby Jordan for his revisions (.1). | 1.00 | | |
| | SAJ | B190 | A104 | Review emails for production regarding committee and designate those that are privileged (sent from Lemmon's office) and pull and review all Shelby Jordan initiated emails. | 1.30 | | |
| | SAJ | B210 | A108 | Call to Rob Dew regarding representation of trust and assistance to handle tax, accounting and reporting issues for Litigation trust. | 0.40 | | |
| | SAJ | B210 | A107 | Discuss source of deposits for Info-W Health monthly royalties and need for turnover to trust the balance in trust account. | 0.30 | | |
| | | | | For Current Services Rendered | 50.90 | | 28,125.00 |

| Recapitulation | | | | |
|------------------|------------|-------|----------|-------------|
| Timekeeper | Title | Hours | Rate | Total |
| SHELBY A. JORDAN | Partners | 44.00 | \$600.00 | \$26,400.00 |
| CRYSTAL MADDEN | Paralegals | 6.90 | 250.00 | 1,725.00 |

Account No: 5481-002000M
Statement No: 922213

Bankruptcy

| | | | | |
|------------|------|------|--------------------|--------------------|
| 01/31/2023 | B110 | E112 | Pacer | 102.50 |
| | | | Total Expenses | 102.50 |
| | | | Total Current Work | 28,227.50 |
| | | | Total Payments | -62,396.65 |
| | | | Balance Due | <u>\$43,700.00</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|------------------|-----------------|
| B110 | Case Administration | 3360.00 | 102.50 |
| B120 | Asset Analysis and Recovery | 1200.00 | 0.00 |
| B130 | Asset Disposition | 480.00 | 0.00 |
| B150 | Meetings of and Communications with Creditors | 480.00 | 0.00 |
| B160 | Fee/Employment Applications | 10125.00 | 0.00 |
| B170 | Fee/Employment Objections | 1860.00 | 0.00 |
| B185 | Assumption/Rejection of Leases and Contracts | 660.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 5220.00 | 0.00 |
| B100 | Administration | <u>23,385.00</u> | <u>102.50</u> |
| B210 | Business Operations | 3660.00 | 0.00 |
| B250 | Real Estate | 240.00 | 0.00 |
| B200 | Operations | <u>3,900.00</u> | <u>0.00</u> |
| B310 | Claims Administration and Objections | 840.00 | 0.00 |
| B300 | Claims and Plan | 840.00 | 0.00 |

Your trust account #1 balance is

| | | |
|------------|---|--------------------|
| | Opening Balance | \$146,790.16 |
| 02/13/2023 | Payment of December Fees (80% of fees and 100% of expenses) | -62,396.65 |
| | Closing Balance | <u>\$84,393.51</u> |

The entry N/C signifies time spent for which there will be no charge.

JORDAN & PART LLP
 500 N. SHORELINE BLVD, SUITE 900
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 March 02, 2023
 Account No: 5481-002000M
 Statement No: 922268

Bankruptcy

PREVIOUS BALANCE

\$43,700.00

Hours

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|------------|-----|------|------|---|------|
| 02/01/2023 | CRM | B160 | A103 | Revise exhibit A to first monthly fee statement to show time spent broken down and email amended exhibit A to co-counsel. | 1.10 |
| | SAJ | B160 | A107 | Call from and copy of fee agreement from Andino Reynal. | 0.30 |
| | SAJ | B170 | A103 | Work on edits to December fee statement and amendments. | 0.70 |
| | SAJ | B170 | A104 | Review form and content of Battaglia fee statement. | 0.30 |
| | SAJ | B190 | A104 | Review/analyze and comment on confidentiality order and copy co-counsel. | 0.40 |
| 02/02/2023 | CRM | B160 | A103 | Additional edits to first monthly statement and december invoice based on change to AO time entry (.5); email to Shelby Jordan and co-counsel with changes to same. (.1). | 0.60 |
| | SAJ | B210 | A108 | Receive and forward to financial consultant the Guadalupe County Tax office notice of address for ranch property for schedules and to change to debtor. | 0.20 |
| | SAJ | B160 | A106 | Email and call regarding Jones signature on Reynal fee agreement and email and call to client to arrange. | 0.40 |
| | SAJ | B170 | A104 | Review/analyze Reynal billings and comment on two-way travel billings and hourly rate. | 0.30 |
| | SAJ | B190 | A107 | Review and respond to Moshenberg email regarding sharing all discovery from the state court litigation and conference with Battaglia and co-counsel on protective order and opposition to disclosures without agreed protective order and review two additional drafts. | 0.80 |
| | SAJ | B190 | A103 | Review and begin comments on Reynal's email summary of response to demand for retraction and telephone conference with Reynal and debtor on how to further respond. | 0.80 |

Bankruptcy

Hours

| Date | SAJ | B190 | A107 | Description | Hours |
|------------|-----|------|------|---|-------|
| | SAJ | B190 | A107 | Review and forward to co-counsel issues with Moshenberg summary of clawback issues after review of attachments. | 0.60 |
| 02/03/2023 | SAJ | B160 | A103 | Finish and circulate amended December fee statement with further breakdown of codes. | 0.60 |
| | SAJ | B160 | A104 | Review/analyze reynal edited fee agreement and discuss with debtor regarding hourly rate. | 0.30 |
| | SAJ | B190 | A104 | Review emails and draft of new version of protective order. | 0.30 |
| 02/05/2023 | SAJ | B210 | A106 | Call and email to client regarding status of matters and request for in person meeting. | 0.30 |
| | SAJ | B190 | A107 | Email to co-counsel regarding status of issues and suggestion for an "all hand" conference call with Bob regarding FSS and mediation. | 0.20 |
| 02/06/2023 | SAJ | B210 | A106 | In office meeting with debtor and review status of all operations and all outstanding operating issues. | 0.90 |
| | SAJ | B210 | A107 | Email to co-counsel for an "all hands" meeting for joint status update. | 0.10 |
| | SAJ | B210 | A106 | Telephone conference with client and Rob Dew regarding status of settlement trust and potential adoption of Alex Jones issues and Plan. | 0.80 |
| | SAJ | B210 | A108 | Telephone call regarding litigation settlement trust and status of assets and scheduling of potential or actual interest in LST assets and need to update all SOS filings including reports for franchise reports and conference regarding getting CPA for LST to prepare the reports and accounting. | 0.80 |
| 02/07/2023 | SAJ | B110 | A106 | Conference with debtor regarding DIP operations to answer questions and issues of debtor regarding personnel and handling. | 0.70 |
| | SAJ | B110 | A107 | Conference with co-counsel on status of schedules and statements and status of issues raised by debtor in operations and completion of schedules and call to debtor for update after co-counsel call. | 1.00 |
| | SAJ | B110 | A107 | Review FSS response to Ponzer Lift Stay and conference with co-counsel regarding motion for relief from stay by Ponzer and DeLaRosa and Alex Jones response additions. | 0.60 |
| | SAJ | B190 | A107 | Conference call with co-counsel and Judge Isgur regarding status of schedules, disclosures and mediation and pull both Texas Judgement and Connecticut Judgement for memo to debtor and co-counsel on dischargeability (adapt for mediation | |

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| | | | | statement). | Hours 1.00 | |
| 02/08/2023 | SAJ | B210 | A103 | Begin draft on right to indemnity both contractual and statutory for FSS Administrative claim by Alex Jones for unpaid post-petition salary, advances of funds, Conn travel and lodging expenses and employment agreement. | 1.60 | |
| | SAJ | B120 | A106 | Call to debtor regarding schedules and statements and completion of asset listing and conference regarding "opportunity" analysis if value is involved and disclosures. | 0.60 | |
| | SAJ | B130 | A106 | Conference with client and CRO regarding helicopter privileges. | 0.30 | |
| | SAJ | B190 | A103 | Work on memo to co-counsel regarding Heslin (TX) and Lafferty (Conn) judgments and evaluation of appellate grounds (also dischargeability grounds) including trial and submission defects that prevent res judicata, collateral estoppel, issue preclusions etc. | 2.10 | |
| 02/09/2023 | SAJ | B160 | A103 | Review, edit and approve certificate of no objection. | 0.30 | |
| | SAJ | B180 | A103 | Work on attorneys fees claim for sanction payment and prepare memo on Supreme Court guidance on hourly billing regarding Bankston failure to keep time records (payment funded by debtor) and state court \$1 million dollar payment funded by debtor Alex Jones. | 2.80 | |
| | SAJ | B190 | A104 | Review final draft of confidentiality agreement. | 0.60 | n/c |
| | SAJ | B190 | A108 | Mediation meeting with co-counsel and Judge Isgur. | 0.40 | |
| | SAJ | B190 | A106 | Work on modified transcript and meet at debtors office to begin to pull and review videos for retraction. | 2.30 | |
| | SAJ | B190 | A104 | Review/analyze all parties exhibit and witness list and pull documents important to debtor. | 0.40 | |
| 02/10/2023 | SAJ | B210 | A106 | Call and conference with debtor regarding give-send-go account administered by Norm Pattis and need for an accounting. | 0.40 | |
| | SAJ | B210 | A104 | Concerns about collection of Youngevity monthly payments and reasons for stop payments and advancement of trust account funds and gather information for co-counsel to schedule and to contact Youngevity CEO or its counsel. | 0.50 | |
| | SAJ | B140 | A107 | Review and respond to co-counsel regarding hearing on lift stay as only preliminary and review exhibit and witness list. | 0.20 | |
| | SAJ | B190 | A106 | Work with debtor and Rob Dew on first full transcript and full videos for response to demand for retraction by Lewis and | | |

Bankruptcy

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| | | | recommend viewing all videos from both cameras. | Hours 3.80 |
| | SAJ | B190 | A107 Review final confidentiality agreement with PQPR removed and email to co-counsel.) | 0.30 |
| 02/12/2023 | SAJ | B210 | A106 Call from debtor and forwarding copies of notes from Reynal regarding response to Bankston Demand letter for retraction. | 1.50 |
| | SAJ | B210 | A103 Begin additional research on how to respond to denial of conversation and how to deal with demand for retraction of non-slandorous statements and prepare initial memo to support outline of details of the proposed written response (and all video response) and circulate V1 and V2 of written response. | 2.80 |
| 02/13/2023 | SAJ | B210 | A107 Meeting with co-counsel in debtor's office regarding work on final input to schedules and statements and verify trust account balances and status of issues regarding the 2022 settlement trust termination, winding down and sale of assets. | 1.30 |
| | SAJ | B160 | A103 Work on January billing statements request and hold back. | 0.30 |
| | SAJ | B170 | A106 Conference with debtor regarding \$800.00 per hour for litigation and other issues with litigation issues. | 0.20 |
| | SAJ | B170 | A107 Emails to co-counsel on total fees issues and costs of appeal. | 0.20 |
| | SAJ | B210 | A106 Meeting with debtor in office regarding download of sequence of events to be reflected in video and video clips from trial and on air. | 2.00 |
| | SAJ | B210 | A108 Meeting with Rob Dew to begin review of all video clips and to add video clips of second day testimony and work on video cuts and additions and work on titles of each clip at debtor's offices with Rob Dew. | 2.60 |
| | SAJ | B210 | A103 Work on and circulate V3 and V4 of written response and add additional research. | 2.50 |
| | SAJ | B210 | A108 Conference with Ben Brooks regarding how to respond to demand of non slanderous statement. | 0.50 |
| | SAJ | B210 | A104 Obtain copy of complete Piers Morgan interview and view. | 1.00 |
| | SAJ | B210 | A107 Emails to and from Reynal regarding scope of Bankston's publication of non-clawed back production and HIPPA information. | 0.30 |
| | SAJ | B210 | A104 Review/analyze witness and exhibit lists for February 14th hearings. | 0.20 |
| | SAJ | B210 | A107 Review and discuss with co-counsel email from Lemmon on behalf of PQPR production of documents. | 0.30 |

Bankruptcy

Hours

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| 02/14/2023 | CRM | B160 | A103 | Prepare second monthly fee notice and send to Shelby for approval before filing. | 0.60 |
| | SAJ | B110 | A107 | Meeting with co-counsel at debtor's office and review final (initial) schedules and statements and edits. | 1.10 |
| | SAJ | B210 | A107 | Conference with Vicki Driver regarding 2022 settlement litigation trust and ownership of its three entities Info-W, Info-Health and Prison Planet TV and review trust documents regarding memo for current treatment of entities. | 1.30 |
| | SAJ | B210 | A108 | Conference with Richard Dale CPA regarding discussing background of trust and assuring all entities of litigation settlement trust have all SOS reports filed or updated for "good standing" certificates and reporting deficiencies and discuss terms of terms of retention and request for retainer. | 0.70 |
| | SAJ | B190 | A106 | Meeting with debtor in his office regarding work on V5 of written response to Bankston demand letter for retraction of Piers Morgan interview statements and conference with Rob Dew to make additions and edits to video sequence, copy V4 to co-counsel including Reynal and request input and edits. | 4.00 |
| 02/15/2023 | CRM | B160 | A103 | File Second Monthly Fee Statement for January and serve same. | 0.20 |
| | SAJ | B190 | A106 | Telephone conference with debtor and Ray Battaglia regarding Bankston's filing of the text messages of Alex in state court as a violation of the automatic stay to collect a debt. | 1.10 |
| | SAJ | B190 | A107 | Email to Andino Reynal and co-counsel regarding this topic and contents of debtor and Battaglia conversation and pull case law regarding disclosure of non-relevant personal information of a litigant. | 1.30 |
| | SAJ | B190 | A103 | Finish debtor's reply to Bankston's slander demand letter and view video response and conference with Rob Dew and debtor of video issues, meeting in Debtor's office for conference and viewing. | 2.60 |
| | SAJ | B320 | A107 | Conference with Battaglia regarding terms of plan of FSS and dependency on Jones for feasibility and request and review copy of plan with Debtor. | 1.30 |
| 02/16/2023 | SAJ | B110 | A104 | Review/analyze and comment regarding production of emails and issues of privilege and notice of joint defense privilege preservation to co-counsel. | 0.40 |
| | SAJ | B110 | A107 | Review and forward to co-counsel multiple press requests for information concerning schedules and statements. | 0.40 |

Bankruptcy

Account No: 5481-002000M
Statement No: 922268

| | | | | Hours | |
|------------|-----|------|------|---|----------|
| | SAJ | B110 | A106 | Receive and forward MOR to client and review MOR with debtor. | 0.50 |
| | SAJ | B210 | A107 | Review motion to revoke FSS status as a subchapter V case and conference with Battaglia. | 1.00 n/c |
| | SAJ | B120 | A104 | Review issues raised by co-counsel for further development in schedule amendments and begin work on trust disclosures. | 0.60 |
| | SAJ | B120 | A107 | Call to Eric Taube regarding work on by estate lawyer that stopped practice. | 0.30 |
| | SAJ | B190 | A107 | Attend zoom meeting with FSS Battaglia and co-counsel regarding mediation and conference with mediator. | 0.80 |
| | SAJ | B190 | A103 | Work on "on air" script and video for retraction demand and call and conference with Rob Dew on edits. | 1.60 |
| | SAJ | B190 | A107 | Call to Reynal and review designation of record on appeal. | 0.30 |
| 02/17/2023 | SAJ | B190 | A104 | Received and reviewed current version of retraction video. | 2.00 |
| | SAJ | B190 | A107 | Forward web access of retraction video to Reynal and co-counsel for review and comment. | 0.30 |
| | SAJ | B190 | A106 | Trip to debtor offices and view new edits to retraction video and conference with client and Rob Dew. | 1.00 |
| 02/18/2023 | SAJ | B190 | A106 | Email and call to Rob Dew regarding addition of statement to clarification/retraction video and call to debtor. | 0.70 |
| | SAJ | B190 | A104 | Review/analyze addition and approve statement for clarification and retraction video. | 0.70 |
| 02/20/2023 | SAJ | B190 | A108 | Call and conversation with Rob Dew regarding edits and final changes to retraction demand video and approve and agree to publish. | 0.80 |
| 02/21/2023 | SAJ | B110 | A107 | Conference with Norm Pattis regarding accounting corrections for "give-send-go" donation account and post petition transfer from account to IOLTA of Pattis and email to counsel. | 0.40 |
| | SAJ | B210 | A106 | Review lengthy email collection forwarded by debtor's ex-wife and discuss with debtor and co-counsel to determine not to respond. | 0.50 |
| | SAJ | B190 | A103 | Work on final draft of video edits and emails and call to editing crew. | 2.50 |
| | SAJ | B190 | A106 | Call to debtor and circulate final draft to all debtor counsel for review and serve final draft of notice of retraction to Bankston. | 0.50 |

Bankruptcy

Account No: 5481-002000M
Statement No: 922268

| | | | | | Hours | |
|------------|-----|------|------|---|-------|-----|
| | SAJ | B190 | A108 | Prepare and attend conference call with mediator Isgur and all debtor related counsel. | 0.80 | |
| 02/22/2023 | SAJ | B110 | A104 | Review and comment on motion to strike sub chapter V designation in FSS chapter 11. | 0.40 | |
| | SAJ | B190 | A108 | Follow up with obtaining all locations of retraction and a copy of the full show including retraction and call to Rob Dew. | 0.40 | |
| 02/23/2023 | SAJ | B110 | A104 | Review summary of amendment to schedules and statement topics and comment and review communication to mediator regarding same. | 0.70 | |
| | SAJ | B210 | A109 | Attend partial 341 meeting and UST questioning and email to co-counsel. | 1.00 | |
| | SAJ | B410 | A106 | Call from client and discuss 341 meeting and issues. | 0.40 | |
| 02/24/2023 | SAJ | B110 | A108 | Coordinate Judge Nelms and Judge Schmidt advances and 1099 to include their 1099 to Matt Okin. | 0.20 | n/c |
| | SAJ | B110 | A104 | Verify that final retraction was published and no response yet from Piers Morgan for show publication and verify receipt by Bankston (no response to date). | 0.60 | |
| | SAJ | B160 | A104 | Review all witness and exhibit lists for hearing to determine exhibits (none) and objections (none). | 0.30 | |
| | SAJ | B190 | A107 | Receive and review 2004 exam of Alex Jones and email to co-counsel. | 0.30 | |
| 02/26/2023 | SAJ | B210 | A106 | Call from debtor regarding operations. | 0.20 | |
| | SAJ | B210 | A106 | Call to debtor operations and 341 meeting. | 0.30 | |
| | SAJ | B210 | A107 | Call to co-counsel and leave message. | 0.10 | |
| 02/27/2023 | SAJ | B210 | A106 | Call to co-counsel and call to client regarding status and discussion with co-counsel regarding 341 meeting and debtor's responses and matters to be done post 341. | 0.40 | |
| | SAJ | B190 | A103 | Work on discharge issues of Connecticut claims and update memo. | 2.00 | |
| 02/28/2023 | SAJ | B110 | A109 | Attend hearing on appeal lawyers retention application (Reynal and Martin). | 0.40 | |
| | SAJ | B110 | A107 | Call and conference with co-counsel regarding status of all pending matters. | 0.30 | |
| | SAJ | B110 | A106 | Call to debtor for scheduling. | 0.20 | |

Bankruptcy

Account No: 5481-002000M
Statement No: 922268

| | | | | | | |
|-----|------|------|---|-------|--|-----------|
| SAJ | B210 | A108 | Conference with Rob Dew and co-counsel regarding how to determine the status of the 2022 litigation trust now in winding down phase with remaining debt in InfoW (not related to the waived debt of Sandy Hook Plaintiffs) and working on memo summary. | Hours | | |
| | | | | 1.70 | | |
| SAJ | B190 | A103 | Work on memo on Connecticut and Texas discharge of debts to supplement mediation statement and email to co-counsel. | 2.00 | | |
| | | | For Current Services Rendered | 86.80 | | 51,205.00 |
| | | | Total Non-billable Hours | 1.80 | | |

| | | | | | |
|-------------------|-----------------------|--------------|--------------|-------------|--------------|
| <u>Timekeeper</u> | <u>Recapitulation</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| SHELBY A. JORDAN | | Partners | 84.30 | \$600.00 | \$50,580.00 |
| CHRYSTAL MADDEN | | Paralegals | 2.50 | 250.00 | 625.00 |

| | | | | | |
|------------|------|------|-------------------------|--|--------------------|
| 02/28/2023 | B110 | E106 | Online research - Lexis | | 2.04 |
| 02/28/2023 | B110 | E106 | Online research - PACER | | 20.40 |
| | | | Total Expenses | | 22.44 |
| | | | Total Current Work | | 51,227.44 |
| | | | Total Payments | | -22,602.50 |
| | | | Balance Due | | <u>\$72,324.94</u> |

Task Code Summary

| | <u>Fees</u> | <u>Expenses</u> |
|---|-------------|-----------------|
| 3110 Case Administration | 4620.00 | 22.44 |
| 3120 Asset Analysis and Recovery | 900.00 | 0.00 |
| 3130 Asset Disposition | 180.00 | 0.00 |
| 3140 Relief from Stay/Adequate Protection Proceedings | 120.00 | 0.00 |
| 3160 Fee/Employment Applications | 2125.00 | 0.00 |
| 3170 Fee/Employment Objections | 1020.00 | 0.00 |
| 3180 Avoidance Action Analysis | 1680.00 | 0.00 |
| 3190 Other Contested Matters (excluding assumption/rejection motions) | 23460.00 | 0.00 |
| 100 Administration | 34,105.00 | 22.44 |
| 210 Business Operations | 16080.00 | 0.00 |
| 200 Operations | 16,080.00 | 0.00 |
| 320 Plan and Disclosure Statement (including Business Plan) | 780.00 | 0.00 |
| 300 Claims and Plan | 780.00 | 0.00 |
| 410 General Bankruptcy Advice/Opinions | 240.00 | 0.00 |

JONES, ALEX

Bankruptcy

| | | <u>Fees</u> | <u>Expenses</u> |
|------|---------------------------|-------------|-----------------|
| B400 | Bankruptcy-Related Advice | 240.00 | 0.00 |

Your trust account #1 balance is

| | |
|--|--------------|
| Opening Balance | \$84,393.51 |
| 3/10/23 Payment of January Fees (80% of fees and 100% of expenses) | -\$22,602.50 |
| Closing Balance | \$61,791.01 |

The entry N/C signifies time spent for which there will be no charge.

JORDAN S. ORTIZ, P.C.
 500 N. SHORELINE BLVD, SUITE 900
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 TAX ID NO. 74-2553880
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JONES, ALEX
 alexejones1777@gmail.com

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 April 06, 2023
 Account No: 5481-002000M
 Statement No: 922376

Bankruptcy

PREVIOUS BALANCE

\$72,324.94

Hours

| | | | | | |
|------------|-----|------|------|--|------|
| 03/01/2023 | SAJ | B210 | A103 | Review financial statements of FSS from August 1, 2022 to January 31, 2023 and prepare memo. | 0.80 |
| | SAJ | B210 | A106 | Call to debtor and conference regarding FSS financial statements. | 0.20 |
| | SAJ | B210 | A107 | Email and respond to co-counsel regarding communication with Jones and status of his response. | 0.20 |
| | SAJ | B190 | A103 | Work on memo regarding dischargeability of Texas and Conn Plaintiffs and circulate drafts to debtor and co-counsel. | 2.80 |
| 03/02/2023 | SAJ | B110 | A108 | Follow up on note for Guadalupe Tax office notice of recording of quitclaim deed and need to change of address to debtor. | 0.20 |
| | SAJ | B120 | A108 | Receive and begin review of email from Richard Reeves sending per my request relevant documents, including emails, January 13 notice of cancellation of membership status and other related documents. | 1.00 |
| | SAJ | B120 | A108 | Call to Reeves for explanation and beginning chronology and how to find missing information. | 0.40 |
| | SAJ | B160 | A103 | Finish modification to Second Monthly Fee Statement to conform February filings. | 0.20 |
| | SAJ | B190 | A107 | Conference with Battaglia regarding Avi Moshenbourg threat to share or make public all documents produced by FSS in underlying state court case and response including response regarding new confidentiality order and publication subject thereto per co-counsel's email notice of intent to be bound and email response to Moshenbourg to notice. | 1.00 |
| | SAJ | B190 | A106 | Email to debtor regarding response to retraction and status of Piers Morgan agreement to air retraction. | 0.20 |

JONES, ALEX

April 06, 2023

Account No: 5481-002000M
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Bankruptcy

| | | | | | Hours | |
|------------|-----|------|------|--|-------|-----|
| | SAJ | B240 | A106 | Review with debtor new POC by IRS of \$558,984.64 and email to Bob Schleizer and co-counsel. | 0.30 | |
| | AO | B190 | A104 | Review memo circulated by Shelby Jordan regarding dischargeability and conference regarding same. | 1.00 | |
| 03/03/2023 | SAJ | B120 | A103 | Receive data dump from Reeves and begin drafting demand to Youngevity recovery of royalty payments and response to suspension letter and conference with Richard Reeves regarding documents and emails and chronology. | 2.20 | |
| | SAJ | B170 | A104 | Review/analyze for confidentiality the Appellee UST designations on appeal by Schwartz and Lee and compare to S&L Appellate designations. | 0.30 | |
| 03/04/2023 | SAJ | B120 | A103 | Work on documents for Youngevity claims review and prepare chronology. | 1.10 | |
| 03/05/2023 | SAJ | B120 | A103 | Work on documents for Youngevity claims including emails and email to Richard Reeves and conference with debtor. | 1.40 | |
| 03/06/2023 | CRM | B160 | A103 | Prepare draft of third monthly fee statement. | 0.70 | |
| | SAJ | B110 | A106 | Call from debtor regarding current operations and FSS financial statements (6 months P&L). | 0.70 | |
| | SAJ | B120 | A104 | Continue to review documents and email correspondence. | 1.30 | |
| | SAJ | B120 | A107 | Call to co-counsel and leave message. | 0.10 | n/c |
| | SAJ | B190 | A107 | Calls on De La Rosa lift stay. | 0.20 | n/c |
| | SAJ | B190 | A104 | Review exhibit lists of hearing on motion to compel for exhibits and expected witnesses. | 0.40 | |
| | SAJ | B190 | A103 | Work on details of research on discharge issue to add back to memo sent to co-counsel. | 0.60 | |
| | SAJ | B140 | A107 | Call to Martin, Reynal, co-counsel regarding unable to attend telephone conference set today and issues of additional trials. | 0.30 | |
| | SAJ | B140 | A106 | Call from debtor about lift stay and attendance on call. | 0.30 | |
| 03/07/2023 | SAJ | B110 | A104 | Receive and review UST's response to motion to revoke sub V status of FSS. | 0.40 | |
| | SAJ | B120 | A108 | Meeting and telephone call with Richard Reeves and review batched emails on issue of Youngevity and review background facts and financial status of Youngevity and research quarterly financial report. | 2.70 | |
| | SAJ | B120 | A106 | Meeting with debtor and co-counsel at debtors office and | | |

JONES, ALEX

April 06, 2023

Account No: 5481-002000M
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Bankruptcy

| | | | | meeting with David Jones on history, chronology and approach to recovery of distributions due debtor from Youngevity. | Hours |
|------------|-----|------|------|---|-------|
| | | | | | 1.00 |
| | SAJ | B140 | A107 | Conference with co-counsel and Reynal regarding stay relief and intention to set trial date and issues of additional trial with Chris Martin. | 0.30 |
| | SAJ | B140 | A106 | Conference with debtor regarding conference with co-counsel and Reynal. | 0.20 |
| 03/08/2023 | SAJ | B210 | A109 | Prepare and attend hearing on motion to compel amendment to schedules. | 0.80 |
| | SAJ | B120 | A103 | Work on demand letter to Youngevity and look for any signed document and amendments. | 1.20 |
| | SAJ | B120 | A106 | Meeting with debtor regarding Youngevity. | 0.40 |
| | SAJ | B320 | A104 | Begin review of FSS Plan filed today and conference with Battaglia regarding Plan and issues of Sub V case designation and objections. | 1.00 |
| | SAJ | B320 | A104 | Review and send current published brief on issues of corporate discharge under 523. | 0.70 |
| 03/09/2023 | SAJ | B210 | A106 | Send debtor copy of FSS plan as requested and brief summary of questions of Sub Ch V. | 0.50 |
| | SAJ | B410 | A106 | Conference with Debtor regarding implications of January 6 evidence and issues regarding debtor. | 0.60 |
| | SAJ | B410 | A107 | Conference with Norm Pattis regarding January 6 evidence and status of debtor's risk of involvement. | 0.30 |
| | SAJ | B120 | A107 | Telephone conference with co-counsel regarding status of Youngevity (both financial and allegations of breach) and work on response and demand for payment. | 0.70 |
| | SAJ | B140 | A107 | Conference with co-counsel on status of stay relief and potential for another trial pre-mediation. | 0.30 |
| 03/10/2023 | SAJ | B160 | A107 | Email explanation to Reynal on fee applications and monthly hold back along with copy of Court's order. | 0.30 |
| | SAJ | B160 | A103 | Finish for circulation 3rd monthly fee statement. | 0.30 |
| | SAJ | B185 | A103 | Review draft of pleading and work on rejection of executory contract motion regarding elevated solutions two contracts. | 0.30 |
| | SAJ | B185 | A106 | Call to debtor and call and message to ESG. | 0.20 |
| | SAJ | B185 | A107 | Email to Bob. | 0.10 |

JONES, ALEX

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Account No: 5481-002000M
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Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|---|-------|
| | SAJ | B185 | A104 | Research contract granting right to represent celebrity and granting interest in the whisky celebrity contract and rejection. | 0.40 |
| | SAJ | B190 | A107 | Emails from and to Reynal regarding agreement with Ponzer defendants on lift stay and status of UCC and Sub V to verify. | 2.00 |
| | SAJ | B190 | A107 | Call to Battaglia regarding response to plaintiffs to revoke the Sub V election and review motion and response and discuss with debtor. | 0.60 |
| 03/13/2023 | CRM | B160 | A103 | Final review of third monthly fee statement and file and serve same. | 0.50 |
| | SAJ | B210 | A106 | Conference with debtor regarding status of notice to court of preliminary issues of conduct of Plaintiffs, status of mediation and upcoming hearings. | 0.40 |
| | SAJ | B160 | A103 | Work on application and Exhibit B of Norm Pattis and emails to co-counsel staff and work on fee agreement signed copies with Alex Jones and FSS. | 2.30 |
| | SAJ | B190 | A104 | Begin review and analysis of Texas and Connecticut Adversary to determine dischargeability of sandy hook plaintiffs claims. | 2.10 |
| 03/14/2023 | SAJ | B160 | A107 | Call to Pattis regarding edits and location of signed fee agreement with debtor Jones and terms of engagement. | 0.40 |
| | SAJ | B160 | A107 | Review Tenco Capital LLC comment and forward to co-counsel. | 0.20 |
| | SAJ | B190 | A104 | Continue to review and analysis of Texas and Connecticut Adversary to determine dischargeability of Sandy Hook Plaintiffs claims. | 1.20 |
| 03/16/2023 | CRM | B190 | A103 | Prepare notices of appearances in all new adversary matters and file same. | 0.50 |
| | SAJ | B185 | A103 | Review and begin edits to motion to reject ESG executory contracts, conference with debtor, call to Joey D and email to Bob. | 1.00 |
| | SAJ | B190 | A104 | Continue to review and comment on objection to dischargeability and conference with debtor regarding same. | 1.30 |
| 03/17/2023 | SAJ | B110 | A106 | Conference with client regarding McGill questions and issues and decision to reject executory contracts and issues raised by Plaintiff in removal of the Sub-V. | 0.40 |
| | SAJ | B185 | A107 | Emails from and to Bob S/Harold regarding rejection of executory contracts of ESG. | 0.20 |

JONES, ALEX

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April 06, 2023

Account No: 5481-002000M
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Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|--|-------|
| | SAJ | B185 | A106 | Email to client and email from co-counsel and telephone conference with ESG and debtor regarding rejection of executory contracts of ESG.. | 0.20 |
| | SAJ | B190 | A103 | Work on pleading summary and analysis regarding dischargeability. | 1.00 |
| | SAJ | B190 | A104 | Receipt and review and compare new 2004 exam to FSS and Alex Jones served by Freeman filed under seal and circulate. | 0.30 |
| | SAJ | B190 | A104 | Receipt and review notice of 2004 exam to ESG and forward and comment. | 0.20 |
| | SAJ | B190 | A106 | Conference with client regarding explanation of suits filed by Tex and NY and defenses and potential new trial. | 0.60 |
| 03/18/2023 | SAJ | B190 | A103 | Work on TX Plaintiffs objection to dischargeability pleading summary and discharge defense research issues. | 2.10 |
| 03/19/2023 | SAJ | B110 | A106 | Call from debtor regarding scheduling meeting with co-counsel and prepare list of issues and topics for conference. | 0.40 |
| 03/20/2023 | SAJ | B110 | A107 | Email to co-counsel with list of Jones questions and scheduling meeting on issues. | 0.20 |
| | SAJ | B210 | A105 | Conference with client regarding current strategy list of pending matters including EGS rejection of contracts and operations, nature of objections to discharge and how procedures work and appellate status. | 0.60 |
| 03/21/2023 | CRM | B120 | A107 | Email from co-counsel regarding current deed for Cedar Creek and pull land records to run search for same to locate and email to co-counsel. | 0.60 |
| | SAJ | B190 | A107 | Review co-counsel email regarding production of documents to UCC and basis of redaction or motion AEO. | 0.20 |
| | SAJ | B190 | A103 | Work on notes and outline to both TX and Conn Plaintiffs objection to dischargeability. | 1.10 |
| 03/22/2023 | SAJ | B190 | A106 | Call from Debtor regarding strategy issues list add Youngevity. | 0.30 |
| | SAJ | B190 | A107 | Call from Norm Pattis regarding debtor issues in Jan 6th subpoena possibility. | 0.20 |
| 03/24/2023 | SAJ | B210 | A106 | Call from debtor and create list of issues and topics debtor wants to have an "all hand" conference on and email to co-counsel regarding next Tuesday meeting. | 1.00 |
| | SAJ | B120 | A103 | Work on Youngevity demand letter to forward to debtor or names and email Harmon for CEO email or correct mailing address. | 1.30 |

JONES, ALEX

Account No: 5481-002000M
Statement No: 922376

Bankruptcy

| | | | | | Hours |
|------------|-----|------|------|--|-------|
| 03/25/2023 | CRM | B120 | A108 | Various emails with BlackBriar regarding wires and search and send all information for same to Shelby Jordan, co-counsel and BlackBriar. | 0.50 |
| 03/26/2023 | SAJ | B210 | A106 | Conference with debtor and co-counsel and work on Youngevity demand letter. | 1.00 |
| 03/27/2023 | SAJ | B210 | A109 | Prepare and attend hearings on cash collateral, sub chapter V revocation, status of discovery and issues regarding operations and Alex relationship with Mountain Way. | 3.20 |
| | SAJ | B210 | A106 | Four telephone calls with debtor. | 0.70 |
| | SAJ | B210 | A107 | Emails to co-counsel and debtor regarding mountain way and actual facts and prepare memo to co-counsel and conference with Ray Battaglia for September and October invoices. | 1.10 |
| | SAJ | B160 | A107 | Get fee agreements from Norm Pattis for execution by Jones. | 0.30 |
| 03/28/2023 | SAJ | B110 | A104 | review past notes and emails to determine if any dealt with Mount Way or McGill and MW. | 0.50 |
| | SAJ | B110 | A104 | Review Mountain Way invoices paid by FSS showing "Alex Jones Show... promoting Satellite Phone and related products" marked paid and review 11 other similar invoices all marked paid. | 1.00 |
| | SAJ | B110 | A107 | Conference with Battaglia and with co-counsel regarding Mountain Way. | 0.40 |
| | SAJ | B110 | A104 | Review draft of SOFA and Schedules. | 0.70 |
| | SAJ | B210 | A107 | Conference with co-counsel and debtor regarding mountain way and notice given on multiple occasions to McGill. | 0.70 |
| | SAJ | B120 | A103 | Prepare notice demand letter to Youngevity for payment of royalties due regarding suspended contract payments and add internet research sites and circulate to debtor and co-counsel. | 2.50 |
| | SAJ | B120 | A107 | Emails from RJ Shannon and co-counsel and emails to both regarding IP transfers. | 0.40 |
| | SAJ | B190 | A103 | Work on full summaries for response to motion regarding dischargeability and forward brief summary to co-counsel and set up conference call regarding dischargeability. | 2.10 |
| | SAJ | B190 | A107 | Review email from Chris Davis regarding team meeting before conference with Plaintiffs counsel on Friday. | 0.30 |
| 03/29/2023 | SAJ | B120 | A107 | Discussion with co-counsel regarding value of the 2022 litigation settlement trust and issues with assets, status, | |

JONES, ALEX

April 06, 2023

Account No: 5481-002000M
Statement No: 922376

Bankruptcy

| | | | | | | |
|------------|-----|------|-----------------------|--|-------|-----------|
| | | | ownership and status. | Hours 0.70 | | |
| | SAJ | B110 | A107 | Work on issues of Mountain Way and emails regarding Jess Schulze notice of Mountain Way and emails to co-counsel. | 0.50 | |
| | SAJ | B110 | A107 | Continue to review issues with Schedules and SOFA and comments from Porter UCC counsel and emails to co-counsel. | 0.80 | |
| | SAJ | B190 | A104 | Review POC docket and determine issues of objections to Plaintiffs claims and memo along with memo on claims estimate where no res judicate applies. | 1.90 | |
| 03/30/2023 | CRM | B150 | A109 | Attend continued 341 meeting and take notes for Shelby Jordan. | 0.90 | |
| | SAJ | B120 | A103 | Forward updated final draft of Youngevity demand letter to co-counsel after conference with Reese and debtor. | 0.80 | |
| 03/31/2023 | SAJ | B110 | A107 | Review email from Bob Schleizer regarding amended schedules and issue raised by Porter (comment) and co-counsel letter regarding value of trust. | 0.40 | |
| | SAJ | B110 | A104 | Review amended schedule A/B for completeness. | 0.30 | |
| | SAJ | B110 | A104 | Review Porter issues of non-cooperation with debtor counsel and comment. | 0.30 | |
| | SAJ | B160 | A108 | Email to Roger Borgelt regarding 2022 litigation trust representation and email to Rob Dew and Richard Dale to assure SOS and certificates of authority are being maintained and counsel is assisting Dew. | 0.60 | |
| | SAJ | B190 | A107 | Conference call with dischargeability team to review Monday and Tuesday matters and work on organization of research for team call. | 3.10 | |
| | SAJ | B190 | A107 | Attend conference call with Plaintiffs counsel regarding proposed scheduling order. | 1.00 | |
| | | | | For Current Services Rendered | 80.40 | 46,820.00 |
| | | | | Total Non-billable Hours | 0.30 | |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 75.70 | \$600.00 | \$45,420.00 |
| ANTONIO ORTIZ | Partners | 1.00 | 475.00 | 475.00 |
| CHRYSTAL MADDEN | Paralegals | 3.70 | 250.00 | 925.00 |

| | | | | |
|------------|------|------|-------|--------|
| 03/31/2023 | B110 | E106 | Pacer | 120.30 |
|------------|------|------|-------|--------|

JONES, ALEX

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April 06, 2023

Account No: 5481-002000M
Statement No: 922376

Bankruptcy

| | |
|--------------------|--------------------|
| Total Expenses | 120.30 |
| Total Current Work | 46,940.30 |
| Total Payments | -40,986.44 |
| Balance Due | <u>\$78,278.80</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|------------------|-----------------|
| 3110 | Case Administration | 4320.00 | 120.30 |
| 3120 | Asset Analysis and Recovery | 11735.00 | 0.00 |
| B140 | Relief from Stay/Adequate Protection Proceedings | 840.00 | 0.00 |
| B150 | Meetings of and Communications with Creditors | 225.00 | 0.00 |
| B160 | Fee/Employment Applications | 3060.00 | 0.00 |
| B170 | Fee/Employment Objections | 180.00 | 0.00 |
| B185 | Assumption/Rejection of Leases and Contracts | 1440.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 16560.00 | 0.00 |
| B100 | Administration | <u>38,360.00</u> | <u>120.30</u> |
| B210 | Business Operations | 6720.00 | 0.00 |
| B240 | Tax Issues | 180.00 | 0.00 |
| B200 | Operations | <u>6,900.00</u> | <u>0.00</u> |
| B320 | Plan and Discosure Statement (including Business Plan) | 1020.00 | 0.00 |
| B300 | Claims and Plan | <u>1,020.00</u> | <u>0.00</u> |
| B410 | General Bankruptcy Advice/Opinions | 540.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | <u>540.00</u> | <u>0.00</u> |

Your trust account #1 balance is

| | | |
|------------|---|--------------------|
| | Opening Balance | \$84,393.51 |
| 03/10/2023 | Payment of January Fees (80% of fees and 100% of expenses) | -22,602.50 |
| 04/04/2023 | Payment of February Fees (80% of fees and 100% of expenses) | <u>-40,986.44</u> |
| | Closing Balance | <u>\$20,804.57</u> |

The entry N/C signifies time spent for which there will be no charge.

500 N. SHORELINE BLVD, SUITE 900
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

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May 04, 2023
Account No: 5481-002000M
Statement No: 922405

Bankruptcy

| PREVIOUS BALANCE | | | | | | \$78,278.80 |
|------------------|-----|------|------|---|-------|-------------|
| | | | | | Hours | |
| 04/02/2023 | SAJ | B110 | A106 | Call from client and follow up conference call with client and Bob S regarding issues of operations and dealings with McGill on Mountain Way. | 2.00 | |
| | SAJ | B190 | A104 | Receive and review witness and exhibit lists for April 4 hearings and review order denying sub-chapter V motion to strike. | 0.40 | |
| 04/03/2023 | SAJ | B110 | A104 | Review/analyze all SOS filings by Richard Dale for affiliate entities and litigation trust entities and forward to Driver and conference with Richard Dale. | 1.00 | |
| | SAJ | B110 | A107 | Conference with Driver and client regarding Mountain way. | 1.00 | |
| | SAJ | B110 | A103 | Work on issues of independent income and employment agreement. | 0.70 | |
| | SAJ | B210 | A104 | Review/analyze emails regarding Driver and Porter issues of disclosures and response and comment. | 0.40 | |
| | SAJ | B210 | A106 | Forward FSS financial statement filed to client and call from client. | 0.60 | |
| 04/04/2023 | CRM | B190 | A109 | Attend scheduling conference for Adversaries. | 0.50 | |
| | CRM | B150 | A109 | Attend continued 341 meeting for Shelby Jordan and take notes. | 1.50 | |
| | SAJ | B110 | A109 | Attend adjourned 341 meeting and conference with client and co-counsel at conclusion. | 2.20 | |
| | SAJ | B210 | A104 | Review/analyze Battaglia billings and attorneys fees request. | 0.20 | |
| | SAJ | B410 | A106 | Conference with client regarding issues of disclosures by Porter and issues of Mountain Way. | 0.40 | |
| | SAJ | B420 | A106 | Review SubCh V report in detail, obtain unredacted copy and | | |

Bankruptcy

| | | | | | Hours |
|-------------------------|-----|------|------|--|-------|
| conference with client. | | | | | 2.30 |
| 04/05/2023 | SAJ | B110 | A106 | Conference with client regarding withdrawal by McGill of product sales and reduced sales of Infowars cite products and go online to verify that substantial products have ben taken down and bitcoin contributions discontinued. | 1.80 |
| | SAJ | B110 | A108 | Call to Bob S, co-counsel regarding report of meeting with McGill and issues of SubV trustees decision to shut down bitcoin donations. | 0.40 |
| | SAJ | B190 | A102 | Work on responsive research and strategy for dischargeability team and research to support strategy regarding dischargeability. | 1.30 |
| | SAJ | B185 | A106 | Conference with Jones regarding ESG rejection motion. | 0.40 |
| 04/11/2023 | CRM | B160 | A103 | Prepare fourth monthly fee statement and email to Shelby Jordan for approval. | 0.80 |
| 04/17/2023 | SAJ | B190 | A107 | Pull stalled email from outbox, update and send on dischargeability. | 1.40 |
| | AO | B110 | A104 | Review memo on dischargeability circulated by Shelby Jordan. | 0.80 |
| 04/20/2023 | SAJ | B185 | A104 | Review Driver email and review attached draft motion to reject ESG and related executory contracts. | 1.00 |
| 04/26/2023 | CRM | B160 | A103 | Final review of Fourth Monthly Fee Statement and file and serve same. | 0.50 |
| | SAJ | B160 | A107 | Work on finding Pattis fee agreement and forward to Driver. | 0.40 |
| 04/27/2023 | SAJ | B210 | A104 | Review FSS status of salary and FSS status of funds to pay Pattis share of appellate fees and conference with Pattis. | 1.00 |
| | SAJ | B120 | A107 | Review agreement regarding Crypto contribution sharing and call to co-counsel. | 0.20 |
| | SAJ | B170 | A104 | Review motion to compromise and witness and exhibit list regarding S&L and Schwartz for hearing. | 0.50 |
| 04/28/2023 | CRM | B190 | A109 | Attend cash collateral hearing and motion to approve settlement hearing. | 1.50 |
| | SAJ | B110 | A104 | Review motion current financial statement of FSS and employment agreement and issues of salary vs income generated to FSS and income from independent sources. | 0.80 |
| | SAJ | B110 | A104 | Review and comment on agreement on donations and crypto accounts at 50/50 and motion to approve stipulation. | 0.60 |

JONES, ALEX

May 04, 2023

Account No: 5481-002000M
Statement No: 922405

Bankruptcy

| | | | | Hours | | |
|------------|-----|------|------|--|-------|-----------|
| | SAJ | B170 | A109 | Attend hearing on objection filed by AEJ to retention/payment of S&L and Schwartz attorneys fees and hearing on cash collateral. | 1.60 | |
| 04/29/2023 | SAJ | B110 | A107 | Call to co-counsel and request call back and prepare outline of issues. | 0.30 | |
| | SAJ | B210 | A107 | Call to Andino Reynal and Norm Pattis regarding appeal, payment and status of both. | 0.40 | |
| | | | | For Current Services Rendered | 28.90 | 15,560.00 |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 23.30 | \$600.00 | \$13,980.00 |
| ANTONIO ORTIZ | Partners | 0.80 | 475.00 | 380.00 |
| CHRYSTAL MADDEN | Paralegals | 4.80 | 250.00 | 1,200.00 |

Total Current Work 15,560.00

Balance Due \$93,838.80Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 6860.00 | 0.00 |
| B120 | Asset Analysis and Recovery | 120.00 | 0.00 |
| B150 | Meetings of and Communications with Creditors | 375.00 | 0.00 |
| B160 | Fee/Employment Applications | 565.00 | 0.00 |
| B170 | Fee/Employment Objections | 1260.00 | 0.00 |
| B185 | Assumption/Rejection of Leases and Contracts | 840.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 2360.00 | 0.00 |
| B100 | Administration | 12,380.00 | 0.00 |
| B210 | Business Operations | 1560.00 | 0.00 |
| B200 | Operations | 1,560.00 | 0.00 |
| B410 | General Bankruptcy Advice/Opinions | 240.00 | 0.00 |
| B420 | Restructurings | 1380.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | 1,620.00 | 0.00 |

Your trust account #1 balance is

| | |
|-----------------|-------------|
| Opening Balance | \$20,804.57 |
| Closing Balance | \$20,804.57 |

JORDAN A. ORTIZ, P.C.
 500 N. SHORELINE BLVD, SUITE 900
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 May 18, 2023
 Account No: 5481-002000M
 Statement No: 922449

Bankruptcy

PREVIOUS BALANCE \$93,838.80

| Date | SAJ | B | A | Description | Hours |
|------------|-----|------|------|---|-------|
| 05/01/2023 | SAJ | B110 | A104 | Pull current docket sheet and review for update memo to client. | 0.60 |
| | SAJ | B110 | A107 | Call to co-counsel for client list of issues. | 0.70 |
| | SAJ | B160 | A107 | Review status of application with Norm Pattis and Ray Battaglia and work on obtaining signed FSS retention agreement. | 1.10 |
| | SAJ | B190 | A107 | Call to co-counsel regarding status of mediation and call to Battaglia regarding mediation. | 0.30 |
| 05/02/2023 | SAJ | B210 | A104 | Work on discovery issues for co-counsel response to committee 2004 notice. | 0.60 |
| | SAJ | B210 | A107 | Review draft of employment agreement and conference with Battaglia regarding salary concern and FSS position. | 2.10 |
| | SAJ | B190 | A104 | Begin review and comment on Answer to Connecticut suit and claim of non-dischargeability (request Texas draft). | 2.10 |
| 05/03/2023 | SAJ | B185 | A104 | Review revised draft of 2004 notice and executory contract rejections (ESG, Tate) and conference with client regarding same. | 0.50 |
| | SAJ | B190 | A104 | Continue to review and comment on answer to Connecticut and Texas suit and claim of non-dischargeability. | 2.00 |
| | SAJ | B190 | A102 | Work on additional research regarding claim of non-dischargeability. | 1.30 |
| 05/04/2023 | SAJ | B190 | A103 | Work on discovery assistance regarding documents for production from email with client and prepare a privilege log of all email correspondence. | 2.00 |
| | SAJ | B190 | A104 | Continue review of Texas Suit and claim of non-dischargeability and work on additional research. | 2.20 |

| | | | | | Hours | |
|------------|-----|------|------|---|-------|-----|
| | SAJ | B190 | A104 | Request draft of Texas Plaintiffs answer. | 0.20 | n/c |
| 05/05/2023 | CRM | B160 | A103 | Begin draft of First Interim Fee Application. | 4.00 | |
| | SAJ | B110 | A103 | Work on proposed employment agreement with FSS to replace prior employment agreement and conference with client regarding agreement and salary issues. | 2.30 | |
| | SAJ | B110 | A107 | Call to co-counsel regarding list of items that debtor wants to discuss. | 0.20 | |
| | SAJ | B160 | A103 | Work on first interim fee application for disbursement of hold backs and proposed order. | 2.00 | |
| | SAJ | B190 | A104 | Finish initial review and comment on Answer to Connecticut and Texas suite and claim of non-dischargeability. | 0.60 | |
| | SAJ | B190 | A102 | Work on additional research and circulate. | 0.70 | |
| | SAJ | B190 | A104 | Review filed answer to Texas complaint. | 1.70 | |
| 05/08/2023 | CRM | B160 | A103 | Continue to work on First Interim Fee Application and send to Shelby Jordan for revisions. | 1.30 | |
| | SAJ | B110 | A106 | Email to debtor and co-counsel and conference with debtor regarding agenda of items debtor wants to discuss and issues raised by co-counsel including employment agreement, platinum money release 1776 coin funds and circulate partial agenda for conference. | 1.70 | |
| | SAJ | B110 | A104 | Review issues raised by UCC regarding Tate and celebrity endorsements and disclosures and conference with co-counsel. | 0.40 | |
| | SAJ | B160 | A103 | Continue to work on first interim application of holdback and interim approval of fees and email to co-counsel. | 1.00 | |
| | SAJ | B190 | A104 | Review 2004 Exam notices of Security State Bank and Michael Zimerman and Charles Cicack. | 0.40 | |
| 05/09/2023 | SAJ | B110 | A107 | Conference with Pattis regarding potential plan issues and third party questions. | 0.40 | |
| | SAJ | B110 | A103 | Work on items agenda for conference on report and court's request for status conference and circulate V1 draft of agenda. | 1.00 | |
| 05/10/2023 | SAJ | B110 | A106 | Conference with client regarding new email address and prepare and complete list of all questions and topics over past 90 days and ask client to pare down for the purpose of meeting with co-counsel and financial advisors. | 1.00 | |
| 05/11/2023 | SAJ | B110 | A107 | Call to Andino Reynal and Norm Pattis regarding return calls on | | |

| | | | | | | |
|------------|-----|------|-------------------------------|--|------|-----------|
| | | | status of appeals. | Hours | | |
| | | | | 0.40 | | |
| | SAJ | B110 | A107 | Email from co-counsel regarding circulated list and await call from financial advisor and reply. | 0.30 | |
| | SAJ | B180 | A107 | Email and conference with Pattis regarding GiveSendGo balances due to Debtor's estate (attorneys fees contributions) and emails from and to Pattis. | 0.30 | |
| | SAJ | B190 | A104 | Review Cicack 2004 notice and check if zoom is available. | 0.40 | |
| 05/12/2023 | SAJ | B110 | A106 | Call with client regarding new list and how to pare down his topics for strategy discussion. | 0.80 | |
| | SAJ | B110 | A106 | Conference with client and financial advisor and planning for weekend. | 0.70 | |
| | SAJ | B190 | A104 | Begin review of Connecticut and Texas Plaintiffs MSJ. | 2.80 | |
| | SAJ | B190 | A107 | Email to co-counsel regarding Plaintiffs offer and status of mediation based on offer and request copy and conference with Ray Battaglia. | 0.70 | |
| 05/14/2023 | SAJ | B110 | A106 | Call from client regarding status of hearing with court and issues to be addressed, status of October trial and staffing, status of legal fees outpacing income now being dedicated to FSS. | 0.70 | |
| | SAJ | B110 | A107 | Email to co-counsel about client concerns and request update. | 0.50 | |
| 05/15/2023 | CRM | B160 | A103 | Revise First Fee Application with updated numbers. | 0.50 | |
| | SAJ | B110 | A107 | Call to Andino Reynal and Norm Pattis regarding return calls on status of appeals. | 0.40 | |
| | SAJ | B110 | A107 | Email from co-counsel regarding circulated list and await call from financial advisor, reply. | 0.20 | |
| | SAJ | B110 | A107 | Email to co-counsel regarding Sunday conversation with client and outline of conference topics. | 0.40 | |
| | SAJ | B190 | A107 | Discovery of settlement offer not sent to Shelby Jordan and discovery of mediation conference with Isgur not discussed with Shelby Jordan and request to co-counsel of copies and summary and conference with FSS counsel. | 1.00 | |
| | | | For Current Services Rendered | 44.30 | | 24,550.00 |
| | | | Total Non-billable Hours | 0.20 | | |

| | | | | | |
|-------------------|----------------|--------------|-------------|--------------|--|
| | Recapitulation | | | | |
| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> | |
| SHELBY A. JORDAN | Partners | 38.50 | \$600.00 | \$23,100.00 | |

Bankruptcy

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| CHRYSTAL MADDEN | Paralegals | 5.80 | 250.00 | 1,450.00 |

| | | | | |
|------------|------|------|--------------------|--------------------|
| 05/15/2023 | B110 | E106 | Pacer | 315.70 |
| | | | Total Expenses | 315.70 |
| | | | Total Current Work | 24,865.70 |
| | | | Total Payments | -20,804.57 |
| | | | Balance Due | <u>\$97,899.93</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 7620.00 | 315.70 |
| B160 | Fee/Employment Applications | 3910.00 | 0.00 |
| B180 | Avoidance Action Analysis | 180.00 | 0.00 |
| B185 | Assumption/Rejection of Leases and Contracts | 300.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 10920.00 | 0.00 |
| B100 | Administration | 22,930.00 | 315.70 |
| B210 | Business Operations | 1620.00 | 0.00 |
| B200 | Operations | 1,620.00 | 0.00 |

Your trust account #1 balance is

| | | |
|------------|---|---------------|
| | Opening Balance | \$20,804.57 |
| 05/15/2023 | Payment of March Fees (partial of 80% of fees and 100% of expenses) | -20,804.57 |
| 05/17/2023 | GiveSendGo Payment from Pattis | 67,760.70 |
| 05/18/2023 | Wire to DIP account for Jones of GiveSendGo Payment | -67,760.70 |
| | Closing Balance | <u>\$0.00</u> |

The entry N/C signifies time spent for which there will be no charge.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**ORDER GRANTING FIRST INTERIM APPLICATION OF APPLICATION OF
JORDAN & ORTIZ, P.C. FOR ALLOWANCE AND PAYMENT OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM
DECEMBER 2, 2022 THROUGH MAY 15, 2023**

On this day came on for consideration the First Interim Application of JORDAN & ORTIZ, P.C., Co-Counsel to Alexander E. Jones, (“Debtor”) for legal services rendered from December 2, 2022 through May 15, 2023. (the “Application”) seeking allowance of compensation incurred during such period of time, and it appears that notice, and service of such Application has been made in accordance with the Federal Rules of Bankruptcy Procedure and the Local Rules promulgated thereunder, and after considering the pleadings of record and the arguments of counsel;

THE COURT FINDS that the legal services provided by Applicant were necessary and beneficial to the estate and that the fees and expenses sought are reasonable after considering the following factors: (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the customary fee; (4) whether the fee is fixed or contingent; (5) the amount involved and the results obtained; (6) the experience, reputation and ability of the professionals; (7) the “undesirability” of the case; and (8) awards in similar cases.

IT APPEARING that to the extent herein provided, that interim compensation and reimbursement of out-of-pocket expenses should be authorized; it is, therefore,

ORDERED that the JORDAN & ORTIZ, P.C. shall be, and hereby is awarded INTERIM compensation of fees in the amount of **Two Hundred Forty-Three Thousand Six Hundred Twenty-Two and 50/100 Dollars (\$243,622.50)** for services rendered and expenses of **One Thousand Sixty-Seven and 59/100 (\$1,067.59)** incurred as legal counsel to the Debtor for the period from December 2, 2022 through May 15, 2023, it is further,

ORDERED that the Debtor is authorized to pay JORDAN & ORTIZ, P.C. the balance of the allowed fees and expenses owed after crediting all payments pursuant to the Interim Compensation Order.

Houston, Texas
Dated: June __, 2023

UNITED STATES BANKRUPTCY JUDGE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**SUMMARY COVER SHEET TO THE SECOND INTERIM APPLICATION OF
JORDAN & ORTIZ, P.C. FOR ALLOWANCE AND PAYMENT OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM
MAY 16, 2023 TO NOVEMBER 30, 2023**

| | | |
|--|--|----------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. ("J&O") | |
| Applicant's Role In Case: | Co-Counsel to Debtor | |
| Indicate Whether This Is an Interim or Final Application: | Second Interim | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in this Application for Which Interim Compensation Has Not Previously Been Awarded: | May 16, 2023 | November 30, 2023 |
| Total Period Covered by Any Prior Applications: | January 1, 2023 | May 15, 2023 |
| Total Amounts Awarded in All Prior Applications (Dkt #346): | \$243,622.50 (fees) \$1,067.59 (expenses) | |
| Total Fees Requested in this Application: | \$61,455.00 | |
| Total Professional Fees Requested in This Application: | \$57,780.00 | |
| Total Professional Hours Covered by This Application: | 96.30 | |
| Average Hourly Rate for Professionals: | \$600.00 | |
| Total Paraprofessional Fees Requested in This Application: | \$3,675.00 | |
| Total Paraprofessional Hours Covered by This Application: | 14.70 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |
| Reimbursable Expenses Sought in This Application: | \$316.99 | |
| Total Fees and Expenses Requested in this Application: | \$61,771.99 | |

| |
|--|
| Were there serves provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? Yes |
| Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? Yes |
| Is the requested compensation based on customary compensation charged by comparable skilled practitioners in other non-bankruptcy cases? Yes |
| Do expense reimbursements represent actual and necessary expenses incurred? Yes |
| Plan Status: Debtor has only recently filed a chapter 11 plan of reorganization. The deadline to file such plan was Friday, December 15, 2023, and the Plan was timely filed [Dkt #523]. |
| Primary Benefits: During the Fee Period, led by co-counsel, the Debtor negotiated with the Texas Plaintiffs and with Connecticut Plaintiffs, worked on his personal budget and sources of income, and prepared and filed his Chapter 11 Plan. |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**SECOND INTERIM APPLICATION OF JORDAN & ORTIZ, P.C. FOR ALLOWANCE
AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
INCURRED FOR THE PERIOD FROM MAY 16, 2023 TO NOVEMBER 30, 2023**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE CHRISTOPHER LOPEZ:

COMES NOW Jordan & Ortiz, P.C. (the “Applicant”) hereby submits its Second Interim Application for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period from May 16, 2023 through November 30, 2023 (the “Application”) for second interim allowance of (a) compensation in the amount of \$61,455.00 for professional services Applicant rendered to the Debtor from May 16, 2023 through November 30, 2023 (the “Fee Period”) and (b) reimbursement of actual and necessary expenses in the amount of \$316.99 that Applicant incurred during the Fee Period.

ITEMIZATION OF SERVICES RENDERED AND EXPENSES INCURRED

1. In support of this Application, J&O attaches the following exhibits:

Exhibit A – Fifth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from May 16, 2023 through June 30, 2023 [Docket #375]

Exhibit B – Corrected Sixth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from July 1, 2023 through July 31, 2023 [Docket #443]

Exhibit C – Seventh Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from August 1, 2023 through August 30, 2023 [Docket #444]

Exhibit D – Eighth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from September 1, 2023 through September 30, 2023 [Docket #459]

Exhibit E – Ninth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from October 1, 2023 through October 31, 2023 [Docket #476]

Exhibit F – Tenth Monthly Fee Statement of Jordan & Ortiz, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from November 1, 2023 through November 30, 2023 [Docket #520]

JURISDICTION AND VENUE

2. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference from the United States District Court for the Southern District of Texas. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicate for the relief sought herein is 11 U.S.C. §§ 330 and 331, Federal Rule of Bankruptcy Procedure 2016(a), and the Local Rules of this Court.

RETENTION OF APPLICANT AND PRIOR COMPENSATION BACKGROUND

4. On December 2, 2022 (the “Petition Date”), Alexander E. Jones (the “Debtor”) filed with this Court a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

5. On December 21, 2022, the Debtor filed its Application for Entry of Order Authorizing the Retention and Employment of Jordan & Ortiz, P.C. as Debtor Co-Counsel Effective as of the Petition Date [Docket #71]. On January 20, 2023, the Court entered the Retention Order of J&O as Bankruptcy Co-Counsel for the Debtor [Docket #105].

6. On January 20, 2023, the Court entered its Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (“Interim Compensation Order”) permitting Applicant to receive payment of 80% of fees and 100% of expenses. Pursuant to the Interim Compensation Order [Docket #346], Applicant has received periodic payments on fees still owed under the First Interim Order as set forth below:

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Interim Amount Applied Per #346</u> | <u>Remaining Balance Due</u> |
|------------------------------|---------------------|---------------------|---------------------|-------------------|----------------------|-----------------------|--|------------------------------|
| First Fee Application | | | | | | | | |
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 | \$0.00 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 | \$0.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 | \$0.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 | \$0.00 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$2,168.44 | \$13,391.56 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | | \$24,865.70 |
| | | TOTALS | \$243,622.50 | \$1,067.59 | \$244,690.09 | -\$146,790.16 | \$59,642.67 | \$38,257.26 |

7. On May 29, 2023, Applicant filed its First Interim Application for Compensation for the period of December 1, 2022 to May 15, 2023 [Docket #306]. The Court entered its Order on June 23, 2023 Granting Applicant’s First Interim Fee Application for a total of \$243,622.50 for fees and \$1,067.59 for expenses [Docket #346] (the “First Interim Order”).

8. Pursuant to the First Interim Order Applicant has received payment of \$50,668.32 which has been applied to the oldest invoices due from the First Interim Application.

9. This is Applicant's Second Interim Application. This Application includes fees and expenses incurred during the entire period of Applicant's engagement from May 16, 2023 through November 30, 2023.

10. These services were rendered, and expenses incurred during Applicant's representation of the Debtor in this case. Applicant believes such fees and expenses were reasonable, necessary, and appropriate, given the circumstances.

NATURE AND EXTEND OF LEGAL SERVICES PROVIDED

11. Applicant has provided extensive legal services to the Debtor during the six (6) months comprising the Interim Period. Attached to this Application as Exhibits "A-F" are records of the time keeping entries during the Interim Period generated by Applicant's personnel who have worked on this engagement (the "Invoice"). These entries provide detailed descriptions of Applicant's services on the Debtor's behalf during the Interim Period.

12. The Invoices also specify each attorney who provided compensable services during the Interim Period. Specifically, the Invoices identify the person providing the service, as well as the following: (1) that person's individual billing rate and (2) the total number of hours expended by that person.

13. Applicant has broken down its legal services rendered according to the project categories propounded by the Guidelines of the Office of the United States Trustee. The pertinent project categories are:

- Case Administration
- Asset Analysis and Recovery
- Asset Disposition
- Relief from Stay/Adequate Protection Proceedings
- Meetings of and Communications with Creditors
- Fee/Employment Applications
- Fee/Employment Objections
- Avoidance Action Analysis

- Assumption/Rejection of Leases and Contracts
- Other Contested Matters (excluding assumption/rejection motions_
- Business Operations
- Employee Benefits/Pensions
- Financing/Cash Collections
- Tax Issues
- Real Estate
- Board of Directors Matters
- Claims Administration and Objections
- Plan and Disclosure Statement (including Business Plan)
- General Bankruptcy Advice/Opinions
- Restructurings

14. The figures for the time and amounts billed per project category cover the Interim Period. The following chart generally describes the services rendered by Applicant to the Debtor in each of the relevant project categories, with more additional detail provided by in Exhibits “A-F”:

| FEES INCURRED IN INTERIM PERIOD | | |
|--|-------|-------------|
| CATEGORIES | HOURS | FEES |
| B110 Case Administration | 37.90 | \$22,740.00 |
| B120 Asset Analysis and Recovery | 0.80 | \$480.00 |
| B130 Asset Disposition | 0.30 | \$180.00 |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | 11.30 | \$3,455.00 |
| B170 Fee/Employment Objections | 1.00 | \$600.00 |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 49.70 | \$28,000.00 |
| B195 Non-Working Travel | | |
| B210 Business Operations | 2.90 | \$1,740.00 |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 3.30 | \$1,980.00 |

| | | |
|---|---------------|--------------------|
| B320 Plan and Disclosure Statement | 0.90 | \$540.00 |
| B410 General Bankruptcy Advice/Opinions | 2.90 | \$1,740.00 |
| B420 Restructurings | | |
| TOTALS: | 111.00 | \$61,455.00 |

REQUEST FOR REIMBURSEMENT OF EXPENSES INCURRED

15. While providing legal services to the Debtor, Applicant incurred certain reasonable and necessary out-of-pocket expenses while representing the Debtor. A detailed record of these expenses is included in the Invoice. Expenses were billed at actual cost. Applicant does not charge for long distance telephone, outgoing faxes, and in-house charges for copying and postage. Outside copies and postage are billed the rate by the vendor. Applicant has made no request for general overhead expenses.

16. Applicant's post-petition expenses are separated into relevant categories as set forth in the table below, with additional detail set forth in Exhibits "A-F".

| EXPENSE | AMOUNT |
|----------------|-----------------|
| Court Fees | \$300.00 |
| Research | \$16.99 |
| TOTAL | \$316.99 |

17. Applicant believes that expense request is reasonable, appropriate, and necessary and requests that the Court grant it reimbursement for \$316.99 in reimbursable expenses incurred during the Interim Period by Applicant on the Debtor's behalf.

FACTORS AFFECTING COMPENSATION

18. Courts recognize that factors other than the number of hours spent and the hourly rate normally charged may be considered in fixing the amount of reasonable attorneys' fees to be awarded in a bankruptcy proceeding. Such factors are set forth in, *In re First Colonial Corporation of America*, 544 F.2d 1291 (5th Cir. 1977) and *Johnson v. Georgia Highway Express, Inc.*, 488

F.2d 714 (5th Cir. 1974). One or more of these Johnson factors may serve as a basis for enhancing the hourly rate which might otherwise be allowed. *Wolf v. Frank*, 555 F.2d 1213 (5th Cir. 1987). The Johnson factors are discussed in further detail below.

A. Time and Labor Required. Exhibits “A-F” lists in detail all the work performed for which compensation is sought. Time entries are broken out by project categories. The date the services were rendered, the individual performing such services, a description of the services, and the time expended are all detailed. Applicant believes that such detail establishes that its request for compensation is reasonable. All the services specified were actual and necessary for the Debtor to perform its statutory duties.

B. Novelty and Difficulty. As set forth in greater detail in Exhibits “A-F”, this case has involved a number of challenging legal and operational issues. The pending Sandy Hook Litigation presented unique issues and hurdles to overcome to preserve the Debtor’s operations and develop a path towards reorganization. Applicant has faced a faced several difficult and complex legal issues, including:

- Continue furnishing documents and past strategy issues and problems to aid co-counsel;
- Work on pre-petition summary of all fees paid by Debtor regarding affiliate Chapter 11 case and participation advice;
- Advising Debtor regarding issues of financial transactions disclosures; issues of historical statements to be corrected as misstatements of counsel for Sandy Hook Plaintiffs and dealing with contributions of debtor to FSS to offset sharing of legal fees and enforcement of the statutory and contractual indemnification of defense costs for employment related litigation (primarily Sandy Hook Plaintiffs);
- Work on issues of appeals of Sandy Hook Plaintiffs cases and advice and discuss issues of Texas Plaintiffs proposals, case authorities, and related arguments.
- Advising the Debtor with respect to the Tort Committee Motion in FSS to revoke the Subchapter V chapter 11 election and the uncertainty of issues surrounding Subchapter V of chapter 11 and impact on Debtor’s case and the various 2004

- notices for document examination and debtor examination and advice regarding the Sub Chapter V Trustee's report and need for clarification of supplemental matters;
- Work on appeals of Court's summary judgment orders and basis for issues raised in drafts of Judge Isgur's mediation statement (not used), including issues of misplaced burden of proof, use of "estimation process to determine plan claims;
- Work on issues of salary reduction and issues of employment agreement to deal with the allowance of indemnification provided therein, outside work as allowed therein, and provisions for exemption of salary to annuities; review and comment on proposed employment agreement and indemnification;
- Work on presentation to bankruptcy court regarding prior mis-statements, including allegation of \$50M+ in draws from 2020 or 2018 and prepare finished version of chart illustration salary of approximately \$2.0M to \$2.2M from fiscal 2014 to 2022; chart showing contributions by Debtor to FSS in 2022 of approximately \$10M to support the continued ability of FSS to operate, including debtors use of a majority of \$3.2M in homestead sale proceeds contributed to FSS and use of \$8M in Bitcoin contributions to debtors Bitcoin wallet paid over to FSS, in addition to financing of consigned Platinum products to allow FSS sales to continue and contributions and advance to FSS initially to ship large backlog of paid for shipments as a result of FSS CRO understatement in his original budget for re-ordering and shipping of products; and
- Work with Debtor in dealings with third parties and issues including ESG and Midmountain issues, including work on documents and evidence of full and timely disclosures of activities or potential activities and related issues.

C. Skill Required to Perform the Legal Services Properly. Bankruptcy is a specialized area of federal practice, requiring knowledge of the Bankruptcy Code and other related state and federal statutes and precedent. It also requires a working knowledge of a number of other areas of complicated legal issues, many of which were on an expedited basis and required a substantial amount of skill. The Court is familiar with the extensive emergency hearings, from the first-day motions to the motions to approve and modify the use of FSS cash collateral to the motions for relief from stay and various other motions.

D. Customary Fee. The hourly rates for each professional are summarized above and in Exhibits "A-F" filed in support of this Application. The rates for bankruptcy attorneys reflect the usual rates charged by the Applicant. The hourly rates requested by Applicant compare

favorably with average costs for similar legal services provided by law firms representing debtors in chapter 11 cases involving the level of sophistication required in this case. Importantly, Applicant's rates are significantly lower than the rates charged by other professionals who have appeared in this case.

E. Whether the Fee is Fixed or Contingent. Applicant's fee is neither fixed nor contingent, other than the contingency of court-allowance and potential for lack of available assets to pay professionals. It is based upon the actual total number of hours worked plus the actual costs incurred.

F. Amount Involved and Results Obtained. Exhibits "A-F" details Applicant's work during the Interim Period. The dates such services were rendered, the individual performing such services, descriptions of the services and the time expended are all detailed. Applicant believes that such information establishes that its requested compensation is reasonable.

G. Experience, Reputation, and Ability of the Attorneys. Mr. Jordan has regularly appeared in significant representations over many years, including bankruptcy cases throughout Texas and the United States and has confirmed plans reorganizing over \$6 billion in claims. Mr. Jordan has fifty years of experience focusing on bankruptcy matters and has a positive reputation in the business and legal community. He is Board Certified in Business Bankruptcy Law by both the State of Texas and the American Bankruptcy Institute, from the first year each respective board certification was offered to Texas counsel. He is recognized among the best lawyers in Texas by Best Lawyers every year since 1990, AV rated every year since 1978 and by Texas Monthly "Super Lawyer" in business bankruptcy for each year published beginning in 2003.

H. "Undesirability" of Case. Representation of the Debtor in this chapter 11 case was undesirable. The Debtor's is a nationally known, and controversial figure and the subject of

public ire, including frequent threats to his and his family safety. Further, given the contentious nature of the Sandy Hook Litigation both by lawyers and the courts and the treatment of the underlying claims, even matters that should be easily agreed are fiercely contested and finally, the potential lack of funding has caused a decision to reduce counsel's participation in the Chapter 11 case to an "as needed" consultant determined by co-counsel.

I. Awards in Similar Cases. Based on Applicant's experience in the Texas legal market and throughout the country, Applicant's fees are lower than the fees allowed to similarly qualified counsel in proceedings of similar scope for the services rendered and results obtained.

RESULTS OBTAINED

19. Applicant offers the following synopsis of its significant efforts on behalf of the Debtor to date:

a. **Case Administration** – Applicant aided, from time to time, co-counsel and the FAs in building the base of information and guiding the Debtor through the administrative aspects of a bankruptcy case. The work toward a potential resolution of the Sandy Hook Judgment Claims and the work to assist the appellate lawyers in understanding the bankruptcy court's claims objection process, claims estimation process, the impact of discovery default judgments and the application by the trial courts, rulings permitting, for example, double hearsay as well as testimony by experts testifying to a jury that the Debtors' combined net worth exceeded \$250,000,000, and the resulting actual and punitive damages resulting.

b. **Experience in Fee/Employment Applications and Objections.** Applicant has prosecuted in bankruptcy cases applications to employ multiple special counsel necessary to defense of state court lawsuits and to prosecute appeals of the resulting judgments, many of those applications were contested. In addition to applications to retain professionals for

the Debtor, numerous applications have been filed for the retention of professionals including in the related FSS bankruptcy case.

c. **Assumption and Rejection of Leases and Contract** – Applicant has filed and prosecuted multiple motions to reject certain contracts and leases and, in this case, reviewed and commented on the several rejection motions for relationships or services no longer necessary to the Debtor’s operations, primarily ESG. Applicant has also analyzed from time to time, with co-counsel, other contracts and leases and attended to termination under the terms of the contracts.

d. **Business Operations** – Applicant has assisted, when asked by co-counsel, the Debtor in evaluating existing and prospective business opportunities with counterparties regarding inventory purchasing, consignment sales to FSS, financing of product fulfillment at FSS, as well as issues of credit card processing, and salary reduction issues, among others.

e. **Financing** - during this term the Debtor has been advised regarding his monthly budget, his salary, and the expectation of salary increases.

f. **Litigation** – The services provided by Applicant to the Debtor related to the mediation and appeals of the Sandy Hook Litigation, the effort to settle the Sandy Hook Judgment and determine the claims analysis for both settlement purposes, and if unsuccessful, for appeals of the orders related to the Sandy Hook Motion for Summary Judgment claims, the appeal positions taken by the co-counsel appellate lawyers as relates to the bankruptcy claims objections and dischargeability, and exchange of advice toward defeating the claims of any collateral estoppel of the Sandy Hook judgments to allow determination in the bankruptcy court or estimation as the case may be.

g. **Meetings and Communications with Creditors** – Applicant has not been involved in any direct communications with counsel for the Sandy Hook Texas and Connecticut Plaintiffs but when consulted advised regarding appeals, settlement, plan terms and the like.

h. **Plan**–The Plan has now been finalized and filed and review of the Plan by Applicant was requested by co-counsel.

20. Other bankruptcy practitioners involved in cases of comparable size and complexity regularly charge hourly rates ranging from \$675.00 to over \$800 per hour. Applicant's approved hourly rate at \$600 in this case is meaningfully lower than the lowest rate in that range. Based upon the services described and the results obtained, the fees requested in this Application are fair and reasonable.

CONCLUSION

21. Pursuant to this Interim Application, Applicant seeks approval on an interim basis of (i) compensation of fees in the total sum of \$61,455.00 and (ii) reimbursement of expenses in the total sum of \$316.99. Applicant requests interim approval and payment of all approved, accrued, and unpaid fees and expenses for the Interim Period.

PRAYER

22. WHEREFORE, Applicant respectfully prays that the Court enter an order (i) approving this Interim Application; (ii) allowing, on an interim basis, the reasonable attorney fees and expenses claimed herein as allowed administrative expenses of the Debtor's estate; (iii) authorizing and directing the Debtor to promptly pay the remaining balance of approved amounts to Applicant; and (iv) granting such other and further relief to which Applicant is justly entitled.

Respectfully submitted December 19, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

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aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on December 19, 2023, true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system as follows.

Raymond William Battaglia on behalf of Creditor Free Speech Systems, LLC

rbattaglia@outlook.com, rwbresolve@gmail.com

Marty L Brimmage on behalf of Creditor Carlee Soto Parisi, Carlos M Soto, Creditor Committee Official Committee Of Unsecured Creditors, Creditor Committee Official Committee of Unsecured Creditors of Alexander E. Jones, David Wheeler, Donna Soto, Francine Wheeler, Ian Hockley, Jacqueline Barden, Jennifer Hensel, Jillian Soto-Marino, Leonard Pozner, Marcel Fontaine, Mark Barden, Neil Heslin, Nicole Hockley, Robert Parker, Scarlett Lewis, Veronique De La Rosa, William Aldenberg and William Sherlach

mbrimmage@akingump.com, monreal@akingump.com; bkemp@akingump.com; apraestholm@akingump.com; txdocketing@akingump.com

Ryan E Chapple on behalf of Creditor Carlee Soto Parisi, Carlos M Soto, David Wheeler, Donna Soto, Francine Wheeler, Ian Hockley, Jacqueline Barden, Jennifer Hensel, Jillian Soto-Marino, Mark Barden, Nicole Hockley, Richard M. Coan, Robert Parker, William Aldenberg and William Sherlach

rchapple@cstrial.com, aprentice@cstrial.com

Scott R. Cheatham on behalf of Creditor Bank of America N.A.

scott.cheatham@arlaw.com, vicki.owens@arlaw.com

Vickie L Driver on behalf of Creditor Free Speech Systems, LLC, Debtor Alexander E. Jones

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Bennett Greg Fisher on behalf of Creditor Public Storage
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Elizabeth Carol Freeman on behalf of Interested Party Melissa A Haselden
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Jennifer Jaye Hardy on behalf of Creditor Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis and Veronique De La Rosa
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Melissa A Haselden
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Eric Henzy on behalf of Plaintiff Richard M. Coan
ehenzy@zeislaw.com

Nicholas Lawson on behalf of Creditor Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis and Veronique De La Rosa
nick.lawson@mhllp.com, patricia.flores@mhllp.com

Stephen Wayne Lemmon on behalf of Creditor PQPR Holdings Limited, LLC
lemmon@slollp.com, mates@slollp.com

John D Malone on behalf of Creditor Security Bank of Texas
myra@johnmalonepc.com, myra@johnmalonepc.com

Jarrold B. Martin on behalf of Creditor Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis, Veronique De La Rosa and Estate of Marcel Fontaine
jarrod.martin@chamberlainlaw.com, Lara.Coleman@chamberlainlaw.com; atty_jmartin@bluestylus.com; valerie.herrera@chamberlainlaw.com

Avi Moshenberg on behalf of Creditor Leonard Pozner, Marcel Fontaine, Neil Heslin, Scarlett Lewis, Veronique De La Rosa, Estate of Marcel Fontaine
avi.moshenberg@mhllp.com, jessica.valdez@mhllp.com

Ha Minh Nguyen on behalf of U.S. Trustee US Trustee
ha.nguyen@usdoj.gov

Johnie J Patterson on behalf of Creditor Elevated Solutions Group, LLC
wandp.ecf@gmail.com; WalkerPatterson@jubileebk.net; wp@ecf.courtdrive.com

Bradley J. Reeves on behalf of Creditor Reeves Law, PLLC
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Stephen A Roberts on behalf of Interested Party David Ross Jones
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Jayson B. Ruff on behalf of U.S. Trustee US Trustee
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Jason Starks on behalf of Creditor Travis County
bkecf@traviscountytexas.gov

Christina Walton Stephenson on behalf of Debtor Alexander E. Jones
Crissie.Stephenson@crowedunlevy.com, elisa.weaver@crowedunlevy.com; ecf@crowedunlevy.com

US Trustee
USTPRegion07.HU.ECF@USDOJ.GOV

Yoshie Valadez on behalf of Creditor Bank of America N.A.
mhtbkanhssselfilings@mccarthyholthus.com, yvaladez@mccarthyholthus.com

/s/ Shelby A. Jordan
Shelby A. Jordan

EXHIBIT “A-F”

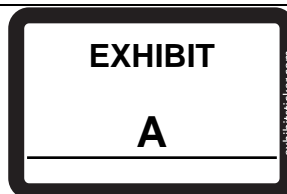
FEE STATEMENTS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**FIFTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
MAY 16, 2023 THROUGH JUNE 30, 2023**

| | | |
|---|------------------------------|-------------------------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 05/16/2023 ¹ | 06/30/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | | \$15,476.00 (80% of \$19,345.00) |
| Total Reimbursable Expenses Requested in this Statement: | | \$203.39 ² |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | | \$18,420.00 |
| Total Actual Attorneys Hours Covered by this Statement: | | 30.70 |
| Average Hourly Rate for Attorneys: | | \$630.13 |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | | \$925.00 |
| Total Actual Paraprofessional Hours Covered by this Statement: | | 3.70 |
| Average Hourly Rate for Paraprofessionals: | | \$250.00 |



¹ May 1-15, 2023 time was included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346).

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") fourth monthly fee statement for compensation (the "Fee Statement") for the period of May 16, 2023 through June 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$15,476.00 (80% of \$19,345.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$203.39 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period May 16, 2023 through June 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$15,476.00 (80% of fees in the amount of \$19,345.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$203.39 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$15,679.39 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: July 19, 2023

/s/ Shelby A. Jordan
SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
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S.D. No. 1127322
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Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on July 19, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”**JORDAN & ORTIZ, P.C. MARCH INVOICE FOR PERIOD
MAY 16, 2023 through June 30, 2023****SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|-------------------------------|--------------------------------|--------------------------------|--------------------|------------------------|---------------------------------|----------------------------------|---|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| TOTAL | | | | \$1,067.59 | \$244,690.09 | -\$146,790.16 | \$97,899.93 |

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TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
June 08, 2023
Account No: 5481-002000M
Statement No: 922462

Bankruptcy

| PREVIOUS BALANCE | | | | | \$97,899.93 |
|------------------|-----|------|------|--|-------------|
| | | | | | Hours |
| 05/16/2023 | SAJ | B110 | A106 | Call to debtor regarding meeting on Saturday. | 0.20 |
| | SAJ | B120 | A107 | Call and conference with Pattis on turnover of give-send-go fund to DIP account and wire instruction from co-counsel. | 0.30 |
| | SAJ | B190 | A107 | Follow up email to co-counsel again requesting a copy of the settlement agreement and status report of telephone conference with Isgur and settlement offer. | 0.20 |
| | SAJ | B190 | A107 | Call from Battaglia and email to Lemmon on settlement and PQPR (David and Carol) 2004 exam and Cicack 2004 exam. | 0.40 |
| 05/19/2023 | SAJ | B110 | A106 | Call with debtor. | 1.00 |
| | SAJ | B110 | A109 | Prepare and attend status conference with court and review timing of mediation offer and response. | 0.70 |
| | SAJ | B110 | A107 | Email and call from Pattis regarding appellate brief and discussions he had with debtor. | 0.70 |
| | SAJ | B110 | A107 | Email to co-counsel regarding items in status conference. | 0.40 |
| 05/22/2023 | SAJ | B110 | A107 | Telephone conference with Pattis and Battaglia regarding retention of fees due by FSS and Jones and work on documents needed. | 0.70 |
| | SAJ | B310 | A103 | Work on edits to Pattis appeal brief and telephone conference with Pattis. | 2.00 |
| 05/24/2023 | CRM | B160 | A103 | Revisions to first interim fee application and send to Shelby Jordan for approval. | 2.20 |
| 05/26/2023 | SAJ | B190 | A104 | Review relief from stay filed by De La Rosa and Posner. | 0.40 |
| | SAJ | B190 | A106 | Call and conference with debtor regarding June 14 hearing. | 0.40 |

Account No: 5481-002000M
 Statement No: 922462

Bankruptcy

| | | | | Hours | | |
|------------|-----|------|------|--|-------|----------|
| | SAJ | B190 | A103 | Final review and forward edits and conference with Pattis regarding edits done to prior appellate brief. | 1.80 | |
| 05/29/2023 | CRM | B160 | A103 | Final review and revisions to first interim fee application and proposed order and file and serve same. | 1.50 | |
| | SAJ | B190 | A103 | Work on final drafts edits to Norm Pattis appeal brief and record excerpts. | 2.00 | |
| 05/30/2023 | SAJ | B190 | A103 | Work on new final drafts edits to Norm Pattis appeal brief and record excerpts and telephone conference with Pattis. | 2.30 | |
| 05/31/2023 | SAJ | B110 | A107 | Call from Pattis regarding attorneys fees remaining and questions of FSS non-payment; email to co-counsel and call to Battaglia. | 0.70 | |
| | SAJ | B190 | A107 | Conference with Pattis regarding appeal brief and my expected edits and work on edits. | 0.80 | |
| | | | | For Current Services Rendered | 18.70 | 9,925.00 |

| | | Recapitulation | | |
|-------------------|--------------|----------------|-------------|--------------|
| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| SHELBY A. JORDAN | Partners | 15.00 | \$600.00 | \$9,000.00 |
| CHRYSTAL MADDEN | Paralegals | 3.70 | 250.00 | 925.00 |

| | | | | |
|--------------------|------|------|-------------------------|---------------------|
| 05/31/2023 | B110 | E106 | Online Research - Lexis | 16.99 |
| 05/31/2023 | B110 | E106 | Online research - Pacer | 172.10 |
| Total Expenses | | | | 189.09 |
| Total Current Work | | | | 10,114.09 |
| Balance Due | | | | <u>\$108,014.02</u> |

| | | | <u>Task Code Summary</u> | |
|------|--|--|--------------------------|-----------------|
| | | | <u>Fees</u> | <u>Expenses</u> |
| B110 | Case Administration | | 2640.00 | 189.09 |
| B120 | Asset Analysis and Recovery | | 180.00 | 0.00 |
| B160 | Fee/Employment Applications | | 925.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | | 4980.00 | 0.00 |
| B100 | Administration | | 8,725.00 | 189.09 |
| B310 | Claims Administration and Objections | | 1200.00 | 0.00 |
| B300 | Claims and Plan | | 1,200.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

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(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
July 11, 2023
Account No: 5481-002000M
Statement No: 922517

Bankruptcy

| PREVIOUS BALANCE | | | | | \$108,014.02 |
|------------------|-----|------|------|--|--------------|
| | | | | | Hours |
| 06/02/2023 | SAJ | B120 | A104 | Review ESG emergency motion to quash discovery and call to client. | 0.30 |
| 06/05/2023 | SAJ | B110 | A106 | Call to client regarding current status of outstanding issues. | 0.30 |
| | SAJ | B160 | A107 | Email and call to Battaglia regarding Connecticut appeal fee due Pattis. | 0.30 |
| | SAJ | B190 | A107 | Conference with Pattis regarding appeal and appeal fees and status of additional California assistance by client/co-counsel. | 0.30 |
| | SAJ | B190 | A107 | Email to co-counsel for first draft of response to MSJ. | 0.30 |
| 06/06/2023 | SAJ | B110 | A106 | Call to client. | 0.20 |
| | SAJ | B110 | A107 | Email to co-counsel regarding communications. | 0.20 |
| | SAJ | B160 | A107 | Conference with Pattis regarding new counsel DH and review and call and message to Battaglia. | 0.40 |
| | SAJ | B190 | A107 | Request draft copies of response to MSJ from co-counsel. | 0.20 |
| 06/08/2023 | SAJ | B110 | A104 | Review docket for update in absence of communications from co-counsel. | 0.40 |
| 06/09/2023 | SAJ | B190 | A103 | Begin review of draft response to MSJ by Sandyhook Plaintiffs. | 2.80 |
| 06/10/2023 | SAJ | B190 | A104 | Work on review and outline of CT and TX MSJ response and briefing. | 1.30 |
| 06/11/2023 | SAJ | B190 | A104 | Continue review of draft of response to MSJ by Sandyhook Plaintiffs amended CT and TX briefing and make notes for appellate lawyers. | 2.10 |
| 06/12/2023 | SAJ | B190 | A104 | Finish review of draft response to MSJ by Sandyhook plaintiffs amended CT and TX briefing and circulate copies and | |

n/c

July 11, 2023

Account No: 5481-002000M
Statement No: 922517

Bankruptcy

| | | | | Hours | | |
|------------|-----|------|--|---|-------|----------|
| | | | comments to Pattis and Martin for important ideas and briefing in the appeals. | 2.30 | | |
| 06/13/2023 | SAJ | B160 | A107 | Conference with Battaglia regarding Pattis application for appellate work and status of issues regarding mediation and counter-proposals from Sandy Hook plaintiffs. s | 0.40 | |
| | SAJ | B190 | A107 | Review and forward to Pattis and Martin filed copies of client's response to MSJ as appellate counsel for consideration in drafting appellate issues and arguments. | 0.70 | |
| 06/14/2023 | SAJ | B190 | A109 | Attend hearing on motion to lift stay tex other plaintiffs and emails to co-counsel regarding Court's response and questions. | 0.80 | |
| 06/23/2023 | SAJ | B170 | A107 | Circulate certificate of no objection to J&O fees and email to co-counsel and advisors and respond to reply regarding payment of 20% holdback and call to Battaglia. | 1.00 | |
| | SAJ | B190 | A107 | Email from Wholman of Randazo firm regarding bad faith claim and court ruling and forward to co-counsel. | 0.40 | |
| 06/29/2023 | SAJ | B110 | A107 | Multiple emails to co-counsel after attending hearings on cash collateral and 9019 settlement Pozner claims and offer in mediation and request status of co-counsel communications on these topics. | 0.40 | |
| | SAJ | B210 | A109 | Attend conference on cash collateral and 9019 Pozner settlement and conference with Battaglia. | 1.00 | |
| | | | | For Current Services Rendered | 15.70 | 9,420.00 |
| | | | | Total Non-billable Hours | 0.40 | |

| | | Recapitulation | | |
|-------------------|--------------|----------------|-------------|--------------|
| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| SHELBY A. JORDAN | Partners | 15.70 | \$600.00 | \$9,420.00 |

| | | | | |
|------------|------|------|--------------------|---------------------|
| 06/30/2023 | B110 | E123 | Research - Pacer | 14.30 |
| | | | Total Expenses | 14.30 |
| | | | Total Current Work | 9,434.30 |
| | | | Balance Due | <u>\$117,448.32</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|-----------------------------|-------------|-----------------|
| B110 | Case Administration | 660.00 | 14.30 |
| B120 | Asset Analysis and Recovery | 180.00 | 0.00 |

JONES, ALEX

July 11, 2023

Account No: 5481-002000M
Statement No: 922517

Bankruptcy

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B160 | Fee/Employment Applications | 660.00 | 0.00 |
| B170 | Fee/Employment Objections | 600.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 6720.00 | 0.00 |
| B100 | Administration | 8,820.00 | 14.30 |
| B210 | Business Operations | 600.00 | 0.00 |
| B200 | Operations | 600.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 5.5 | |
| B120 Asset Analysis and Recovery | .60 | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | 1.1 | 3.70 |
| B170 Fee/Employment Objections | 1.0 | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 19.5 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | 1.0 | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 2.0 | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | | |
| B420 Restructurings | | |
| TOTALS: | 30.7 | 3.70 |

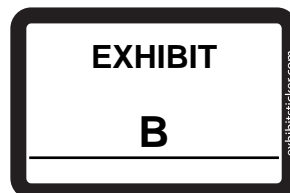
**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

CORRECTED

**SIXTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JULY 1, 2023 THROUGH JULY 31, 2023**

| | | |
|--|-----------------------------------|---------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 07/1/2023 | 07/31/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$4,364.00 (80% of \$5,455.00) | |
| Total Reimbursable Expenses Requested in this Statement: | \$203.39 ¹ | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$3,780.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 6.30 | |
| Average Hourly Rate for Attorneys: | \$600.00 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$1,675.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 6.70 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.’s (“J&O”) sixth monthly fee statement for compensation (the “Fee Statement”) for the period of July 1, 2023 through July 31, 2023 (the “Fee Period”) pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the “Interim Compensation Order”). J&O is filing its sixth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$4,364.00 (80% of \$5,455.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$0.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit “A” is the Fee Statement for the period July 1, 2023 through July 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person’s billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category, including description, incurred with the amounts for which reimbursement is requested. Exhibit

“A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested

fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$4,364.00 (80% of fees in the amount of \$5,455.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$4,364.00 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: September 18, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on September 18, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
December 1, 2022 through June 30, 2023****SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|---------------------------|----------------------------|----------------------------|--------------------|------------------------|-----------------------------|------------------------------|-------------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| 922462 | May 16-31 | 6/8/23 | \$9,925.00 | \$189.09 | \$10,114.09 | \$0.00 | \$10,114.09 |
| 922517 | June | 7/11/23 | \$9,420.00 | \$14.30 | \$9,434.30 | \$0.00 | \$9,434.30 |
| 922607 | July | 8/3/23 | \$5,455.00 | \$0.00 | \$5,455.00 | \$0.00 | \$5,455.00 |
| TOTAL | | | | \$1,270.98 | \$269,693.48 | -\$146,790.16 | \$122,903.32 |

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JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 August 03, 2023
 Account No: 5481-002000M
 Statement No: 922607

Bankruptcy

| PREVIOUS BALANCE | | | | | \$117,448.32 |
|------------------|-----|------|------|---|--------------|
| | | | | | Hours |
| 07/07/2023 | SAJ | B110 | A104 | Work on edits on employment agreement for client with FSS. | 1.80 |
| 07/09/2023 | SAJ | B110 | A104 | Pull prior employment agreement and review the employment agreement contract and compare issues. | 0.40 |
| 07/10/2023 | SAJ | B110 | A103 | Finish edits to employment agreement and forward to co-counsel with email and indemnity question. | 0.40 |
| 07/13/2023 | SAJ | B190 | A104 | Work on document production for client's efforts to acquire annuity under employment agreement and email to co-counsel regarding attorney client privileged communications. | 0.60 |
| 07/14/2023 | CRM | B190 | A104 | Email from Shelby Jordan to pull emails regarding annuity for possible production for Vickie Driver and begin pulling. | 2.00 |
| | SAJ | B190 | A104 | Begin to pull emails regarding annuities and emails to co-counsel regarding same. | 1.00 |
| 07/17/2023 | CRM | B190 | A104 | Continue to pull emails regarding annuity for possible production for Vickie Driver. | 2.20 |
| 07/18/2023 | CRM | B190 | A104 | Continue to pull emails regarding annuity for possible production for Vickie Driver and email same to Shelby Jordan. | 1.00 |
| | CRM | B160 | A103 | Prepare draft of fifth notice of monthly fee statements for May and June and email same to Shelby Jordan for revisions and approval to file. | 1.00 |
| 07/19/2023 | CRM | B160 | A103 | File and serve 5th monthly fee statement. | 0.50 |
| 07/20/2023 | SAJ | B190 | A104 | Work on document email production (AEJ regarding annuity efforts to purchase) to forward to co-counsel summary of background on annuity planning and transactions. | 1.10 |
| 07/24/2023 | SAJ | B190 | A104 | Finish internal review of email to pull all relevant to annuity issue and email to co-counsel that none extra are found. | 0.70 |

JONES, ALEX

Page: 2

August 03, 2023

Account No: 5481-002000M
Statement No: 922607

Bankruptcy

Hours

| | | | | | | |
|------------|-----|------|------|--|-------|----------|
| 07/25/2023 | SAJ | B190 | A107 | Email to co-counsel regarding production of emails from J&O regarding annuity and pull ones marked by J&O as non-privileged. | 0.30 | |
| | | | | For Current Services Rendered | 13.00 | 5,455.00 |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 6.30 | \$600.00 | \$3,780.00 |
| CHRYSTAL MADDEN | Paralegals | 6.70 | 250.00 | 1,675.00 |

| | | | | | | |
|------------|--|------|------|--------------------|--|----------|
| 07/31/2023 | | B110 | E106 | Pacer | | |
| | | | | Total Current Work | | 5,455.00 |

| | | | | | | |
|--|--|--|--|-------------|--|---------------------|
| | | | | Balance Due | | <u>\$122,903.32</u> |
|--|--|--|--|-------------|--|---------------------|

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 1560.00 | 0.00 |
| B160 | Fee/Employment Applications | 375.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 3520.00 | 0.00 |
| B100 | Administration | 5,455.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

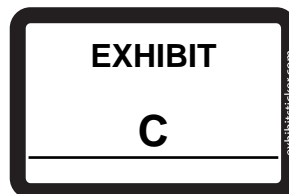
| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 2.6 | |
| B120 Asset Analysis and Recovery | | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | | 1.5 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 3.7 | 5.2 |
| B195 Non-Working Travel | | |
| B210 Business Operations | | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | | |
| B420 Restructurings | | |
| TOTALS: | 6.3 | 6.7 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**SEVENTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
AUGUST 1, 2023 THROUGH AUGUST 30, 2023**

| | | |
|---|------------------------------|-----------------------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 08/1/2023 | 08/30/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | | \$3,628.00 (80% of \$4,535.00) |
| Total Reimbursable Expenses Requested in this Statement: | | 32.50 ¹ |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | | \$4,260.00 |
| Total Actual Attorneys Hours Covered by this Statement: | | 7.10 |
| Average Hourly Rate for Attorneys: | | \$600.00 |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | | \$275.00 |
| Total Actual Paraprofessional Hours Covered by this Statement: | | 1.10 |
| Average Hourly Rate for Paraprofessionals: | | \$250.00 |



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") seventh monthly fee statement for compensation (the "Fee Statement") for the period of August 1, 2023 through August 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its seventh monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$3,628.00 (80% of \$4,535.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$32.50 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached above as Exhibit "A" is the Fee Statement for the period August 1, 2023 through August 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$3,628.00 (80% of fees in the amount of \$4,535.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$32.50 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$3,660.50 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: September 18, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on September 18, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
December 1, 2022 through July 31, 2023****SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|---------------------------|----------------------------|----------------------------|---------------------|------------------------|-----------------------------|------------------------------|-------------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| 922462 | May 16-31 | 6/8/23 | \$9,925.00 | \$189.09 | \$10,114.09 | \$0.00 | \$10,114.09 |
| 922517 | June | 7/11/23 | \$9,420.00 | \$14.30 | \$9,434.30 | \$0.00 | \$9,434.30 |
| 922607 | July | 8/3/23 | \$5,455.00 | \$0.00 | \$5,455.00 | \$0.00 | \$5,455.00 |
| 922637 | August | 9/7/23 | \$4,535.00 | \$32.50 | \$4,567.50 | \$0.00 | \$4,567.50 |
| TOTAL | | | \$272,957.50 | \$1,303.48 | 274,260.98 | -\$146,790.16 | \$127,470.82 |

500 N. SHORELINE BLVD, SUITE 804
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
September 07, 2023
Account No: 5481-002000M
Statement No: 922637

Bankruptcy

| PREVIOUS BALANCE | | | | | \$122,903.32 |
|------------------|-----|------|------|---|--------------|
| | | | | | Hours |
| 08/01/2023 | SAJ | B410 | A106 | Return call from client regarding operations, income, fees. | 0.70 |
| | SAJ | B410 | A107 | Email to Crissy Stephenson seeking time to be updated on status of case. | 0.20 |
| | | | | | n/c |
| 08/07/2023 | SAJ | B190 | A106 | Call from client regarding status hearing on MSJ and detailed discussion of Court's response and expected arguments by counsel. | 1.10 |
| 08/08/2023 | SAJ | B160 | A103 | Review new draft with Shelby Jordan edits to CRO application and effort to avoid veto of TDA and Harco on waiver of mediation privilege and call to Langston. | 0.70 |
| | SAJ | B310 | A109 | Listen to status conference on MSJ on non-dischargeability. | 0.70 |
| 08/15/2023 | CRM | B160 | A103 | Prepare 6th Monthly Fee Statement and file and serve same. | 0.60 |
| | SAJ | B190 | A109 | Attend hearing on oral arguments, MSJ and conference with client regarding hearing and expected outcome. | 2.50 |
| 08/17/2023 | CRM | B160 | A103 | Final revisions to 6th monthly fee statement notice and file and serve same. | 0.50 |
| 08/18/2023 | SAJ | B110 | A106 | Review and forward FSS MOR to client with comments. | 0.30 |
| 08/29/2023 | SAJ | B110 | A106 | Conference with client regarding latest order for DIP without new salary for Jones and email to co-counsel who clarifies. | 0.40 |
| | SAJ | B110 | A107 | Conference regarding Andino Reynal and hour rate and decision to retain for potential October trial and email to co-counsel. | 0.30 |
| 08/31/2023 | SAJ | B110 | A106 | Call from client regarding current status issues. | 0.40 |
| | | | | For Current Services Rendered | 8.20 |
| | | | | Total Non-billable Hours | 0.20 |
| | | | | | 4,535.00 |

JONES, ALEX

September 07, 2023

Account No: 5481-002000M
Statement No: 922637

Bankruptcy

| <u>Timekeeper</u> | <u>Recapitulation</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|-----------------------|--------------|-------------|--------------|
| SHELBY A. JORDAN | Partners | 7.10 | \$600.00 | \$4,260.00 |
| CHRYSTAL MADDEN | Paralegals | 1.10 | 250.00 | 275.00 |

| | | | | |
|------------|------|------|--------------------|---------------------|
| 08/31/2023 | B110 | E106 | Pacer | 32.50 |
| | | | Total Expenses | 32.50 |
| | | | Total Current Work | 4,567.50 |
| | | | Balance Due | <u>\$127,470.82</u> |

| <u>Task Code Summary</u> | | <u>Fees</u> | <u>Expenses</u> |
|--------------------------|--|-------------|-----------------|
| B110 | Case Administration | 840.00 | 32.50 |
| B160 | Fee/Employment Applications | 695.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 2160.00 | 0.00 |
| B100 | Administration | 3,695.00 | 32.50 |
| B310 | Claims Administration and Objections | 420.00 | 0.00 |
| B300 | Claims and Plan | 420.00 | 0.00 |
| B410 | General Bankruptcy Advice/Opinions | 420.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | 420.00 | 0.00 |

The entry N/C signifies time spent for which there will be no charge.

EXHIBIT “B”**TASK CODES**

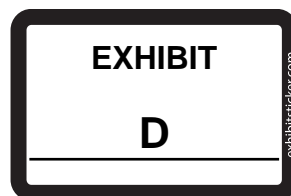
| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 1.4 | |
| B120 Asset Analysis and Recovery | | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | 0.7 | 1.1 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 3.6 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 0.7 | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | 0.7 | |
| B420 Restructurings | | |
| TOTALS: | 7.1 | 1.1 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**EIGHTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

| | | |
|--|-------------------------------------|---------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 09/1/2023 | 09/30/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$12,688.00 (80% of \$15,860.00) | |
| Total Reimbursable Expenses Requested in this Statement: | \$16.10 ¹ | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$15,660.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 26.10 | |
| Average Hourly Rate for Attorneys: | \$600.00 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$200.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 0.80 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") eighth monthly fee statement for compensation (the "Fee Statement") for the period of September 1, 2023 through September 30, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its eighth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$12,688.00 (80% of \$15,860.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$16.10 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit "A" is the Fee Statement for the period September 1, 2023 through September 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$12,688.00 (80% of fees in the amount of \$15,860.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$16.10 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$12,704.10 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: October 10, 2023

/s/ Shelby A. Jordan
SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
State Bar No. 24074839
S.D. No. 1127322
Jordan & Ortiz, P.C.
500 North Shoreline Blvd., Suite 804
Corpus Christi, TX 78401
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on October 10, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
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- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
SEPTEMBER 1, 2023 through SEPTEMBER 30, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|---------------------------|----------------------------|----------------------------|---------------------|------------------------|-----------------------------|------------------------------|-------------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| TOTAL | | | \$272,957.50 | \$1,303.48 | 274,260.98 | -\$146,790.16 | \$127,470.82 |

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

500 N. SHORELINE BLVD, SUITE 804
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
October 04, 2023
Account No: 5481-002000M
Statement No: 922703

Bankruptcy

| PREVIOUS BALANCE | | | | | \$127,470.82 | |
|------------------|-----|------|------|---|--------------|----------|
| | | | | | Hours | |
| 09/06/2023 | SAJ | B190 | A107 | Email to co-counsel regarding 2004 Examination of Alex Jones on the 12th (next Tuesday) and attendance and call from client. | 0.30 | 180.00 |
| | SAJ | B190 | A107 | Email to co-counsel regarding lack of objection to dischargeability regarding the original State Court suit alleging actual fraudulent transfers involving client and David Jones. | 0.50 | 300.00 |
| 09/08/2023 | SAJ | B410 | A103 | Pull prior form of motion and briefing on issues to report to court (including some original 2022 issues) and work on updating for co-counsel. | 1.80 | 1,080.00 |
| 09/10/2023 | SAJ | B110 | A102 | Pull research on indemnity, expense reimbursement, client salary and double reductions and client contributions of \$10M in assets in 2023 and clients \$1M administrative claims. | 1.40 | 840.00 |
| 09/11/2023 | SAJ | B110 | A103 | Work on locating final motion to recover trial expenses and disclosing cost sharing responses to Court's inquiry regarding 25% of trial costs. | 1.10 | 660.00 |
| | SAJ | B110 | A107 | Trip to client office and meeting with co-counsel and work on issues for 2004 exam and for pleading disclosing issues requested by the court since and finish search and additions to 2004 exam issues and expense motion 2022. | 2.60 | 1,560.00 |
| 09/12/2023 | SAJ | B190 | A109 | Attend (remotely) 2004 examination of client and work and send real-time information to co-counsel in response to questions and answers. | 3.20 | 1,920.00 |
| | SAJ | B190 | A106 | Call to co-counsel and client regarding 2004 exam. | 0.20 | 120.00 |
| 09/13/2023 | SAJ | B190 | A109 | Attend part of 2004 exam and pull ESG issues from internet and call to client after examination. | 1.80 | 1,080.00 |
| | SAJ | B190 | A103 | Work on edits to co-counsel response to ROR filing by Committee and support citations to record for arguments. | 2.60 | 1,560.00 |

Bankruptcy

| | | | | | Hours | |
|------------|-----|------|------|--|-------|----------|
| 09/14/2023 | SAJ | B190 | A103 | Work on version 2 and 3 of response to ROR and circulate to co-counsel and conference with client. | 2.00 | 1,200.00 |
| 09/15/2023 | CRM | B160 | A103 | Prepare 7th monthly fee statement and email to Shelby Jordan for approval. | 0.60 | 150.00 |
| | SAJ | B110 | A104 | Review co-counsel editing of ROR response and additional edits sent to co-counsel for approval and filing. | 2.60 | 1,560.00 |
| | SAJ | B320 | A106 | Conference with client regarding ROR memo, edits and information included in reply. | 0.40 | 240.00 |
| 09/18/2023 | CRM | B160 | A103 | File Corrected 6th Monthly Fee Statement and 7th Monthly Fee Statement. | 0.20 | 50.00 |
| 09/19/2023 | SAJ | B110 | A104 | Review MOR of both FSS and client and email to co-counsel regarding \$2.5 M retained in FSS with client unable to pay administrative expenses. | 0.30 | 180.00 |
| | SAJ | B120 | A106 | Conference with client regarding Joey Delano 2004 exam and status. | 0.20 | 120.00 |
| 09/20/2023 | SAJ | B210 | A104 | Review MOR from FSS and AEJ regarding salary issues and inability to fund Ch 11 expenses by FSS retention of all its needed funds. | 0.40 | 240.00 |
| 09/22/2023 | SAJ | B110 | A107 | Email to co-counsel regarding salary issues and additional articles on draws from FSS by client misquoted by Sandy Hook counsel first day. | 0.40 | 240.00 |
| 09/25/2023 | SAJ | B110 | A107 | Call to Battaglia regarding hearing on cash collateral and funds available from FSS to client. | 0.20 | 120.00 |
| 09/26/2023 | SAJ | B210 | A109 | Listen to hearing on cash collateral and related agreements to transfer funds to client regarding administrative claims for advances and for past and current salary (1.4 but only bill .5). | 0.50 | 300.00 |
| 09/28/2023 | SAJ | B190 | A104 | Review 2004 exam notice of scheduling and call to Steve Lemmon and David Jones counsel and email to co-counsel regarding availability of remote attendance. | 0.60 | 360.00 |
| | SAJ | B190 | A106 | Call to client regarding David Jones 2004 exam and email to co-counsel regarding David Jones exam. | 0.50 | 300.00 |
| 09/29/2023 | SAJ | B110 | A107 | Telephone conference with Battaglia regarding DIP bank account closure and issue of mediation ending and confirmation to be set and Court's ruling on MSJ of Plaintiffs. | 0.70 | 420.00 |
| | SAJ | B110 | A107 | Call to Norm Pattis and conference call with client on related potential reasons government wants bank access by client removed. | 0.60 | 360.00 |

JONES, ALEX

October 04, 2023

Account No: 5481-002000M
Statement No: 922703

Bankruptcy

| | | | | | | |
|------------|-----|------|------|---|-------|-----------|
| 09/30/2023 | SAJ | B110 | A106 | Telephone conference with client memo and call to client regarding Battaglia, Pattis regarding banking issues and potential subpoena and update on status of FSS. | Hours | |
| | | | | | 1.20 | 720.00 |
| | | | | For Current Services Rendered | 26.90 | 15,860.00 |

| Recapitulation | | | | | | |
|------------------|--|------------|-------|----------|-------------|--|
| Timekeeper | | Title | Hours | Rate | Total | |
| SHELBY A. JORDAN | | Partners | 26.10 | \$600.00 | \$15,660.00 | |
| CHRYSTAL MADDEN | | Paralegals | 0.80 | 250.00 | 200.00 | |

| | | | | |
|------------|------|------|---------------------------|---------------------|
| 09/30/2023 | B110 | E106 | Computer Research - Pacer | 16.10 |
| | | | Total Expenses | 16.10 |
| | | | Total Current Work | 15,876.10 |
| | | | Total Payments | -30,727.29 |
| | | | Balance Due | <u>\$112,619.63</u> |

Task Code Summary

| | | Fees | Expenses |
|------|--|-----------|----------|
| B110 | Case Administration | 6660.00 | 16.10 |
| B120 | Asset Analysis and Recovery | 120.00 | 0.00 |
| B160 | Fee/Employment Applications | 200.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 7020.00 | 0.00 |
| B100 | Administration | 14,000.00 | 16.10 |
| B210 | Business Operations | 540.00 | 0.00 |
| B200 | Operations | 540.00 | 0.00 |
| B320 | Plan and Discosure Statement (including Business Plan) | 240.00 | 0.00 |
| B300 | Claims and Plan | 240.00 | 0.00 |
| B410 | General Bankruptcy Advice/Opinions | 1080.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | 1,080.00 | 0.00 |

Your trust account #1 balance is

| | | |
|------------|----------------------|----------|
| 09/19/2023 | Opening Balance | \$0.00 |
| | Interim Wire Payment | 8,974.35 |

JONES, ALEX

Account No: 5481-002000M
Statement No: 922703

Bankruptcy

| | | |
|------------|--------------------------------------|------------|
| 09/21/2023 | Payment on 922199 | -8,974.35 |
| 09/28/2023 | Interim Wire Payment | 21,752.94 |
| 10/03/2023 | Payment on 922199, 922213 and 922268 | -21,752.94 |
| | Closing Balance | \$0.00 |

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 11.10 | |
| B120 Asset Analysis and Recovery | 0.20 | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | | 0.80 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 11.70 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | 0.90 | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | | |
| B320 Plan and Disclosure Statement | 0.40 | |
| B410 General Bankruptcy Advice/Opinions | 1.80 | |
| B420 Restructurings | | |
| TOTALS: | 26.10 | .80 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**NINTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

| | | |
|---|------------------------------|-----------------------------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 10/1/2023 | 10/31/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | | \$7,916.00 (80% of \$9,895.00) |
| Total Reimbursable Expenses Requested in this Statement: | | \$0.00 ¹ |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | | \$9,420.00 |
| Total Actual Attorneys Hours Covered by this Statement: | | 15.70 |
| Average Hourly Rate for Attorneys: | | \$600.00 |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | | \$475.00 |
| Total Actual Paraprofessional Hours Covered by this Statement: | | 1.90 |
| Average Hourly Rate for Paraprofessionals: | | \$250.00 |



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.'s ("J&O") ninth monthly fee statement for compensation (the "Fee Statement") for the period of October 1, 2023 through October 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its ninth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$7,916.00 (80% of \$9,895.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$0.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit "A" is the Fee Statement for the period October 1, 2023 through October 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category,

including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$7,916.00 (80% of fees in the amount of \$9,895.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$7,916.00 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: November 9, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

Jordan & Ortiz, P.C.

500 North Shoreline Blvd., Suite 804

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on November 9, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
OCTOBER 1, 2023 through OCTOBER 31, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Remaining Balance Due</u> |
|---------------------------|----------------------------|----------------------------|---------------------|------------------------|-----------------------------|------------------------------|-------------------------------------|
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$15,560.00 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | \$24,865.70 |
| TOTAL | | | \$272,957.50 | \$1,303.48 | 274,260.98 | -\$146,790.16 | \$127,470.82 |

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 11.50 | |
| B120 Asset Analysis and Recovery | | |
| B130 Asset Disposition | | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | | 1.90 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 3.60 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | 0.60 | |
| B320 Plan and Disclosure Statement | | |
| B410 General Bankruptcy Advice/Opinions | | |
| B420 Restructurings | | |
| TOTALS: | 15.80 | 1.90 |

500 N. SHORELINE BLVD, SUITE 804
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
November 06, 2023
Account No: 5481-002000M
Statement No: 922768

Bankruptcy

| PREVIOUS BALANCE | | | | | | \$112,619.63 |
|------------------|-----|------|------|--|-------|--------------|
| | | | | | Hours | |
| 10/02/2023 | SAJ | B110 | A106 | Email to client and Lemmon and co-counsel. | 0.40 | 240.00 |
| | SAJ | B110 | A106 | Conference with client and conference call with co-counsel and client regarding issues with FFC CRO and status of funding, book arrangement, salary and other matters. | 1.20 | 720.00 |
| | SAJ | B190 | A109 | Attend 2004 exam of David Jones (actual time spend 4.0). | 1.50 | 900.00 |
| 10/03/2023 | SAJ | B110 | A106 | Three calls with client regarding discussions yesterday with client, Shelby Jordan and co-counsel and timing of bringing issues to Court's attention if CRO continues to refuse to deal with income and salary issues and email to co-counsel. | 0.70 | 420.00 |
| 10/04/2023 | SAJ | B110 | A106 | Call from client and review regarding Ch V and issue raised regarding McGill opposition to repayment of administrative claim and email to co-counsel. | 0.40 | 240.00 |
| 10/05/2023 | SAJ | B110 | A106 | Call from client regarding Chapter V and issue raised regarding McGill opposition to repayment of administrative claim and client request to call Battaglia. | 0.60 | 360.00 |
| 10/06/2023 | SAJ | B110 | A106 | Conference with client regarding funds holdup by FSS and issue of consent to hold up by SubV Trustee. | 0.40 | 240.00 |
| | SAJ | B110 | A107 | Call to Battaglia and message. | 0.20 | 120.00 |
| 10/07/2023 | SAJ | B110 | A106 | Conference with client regarding refusal of McGill to approve salary or administrative expenses. | 0.40 | 240.00 |
| | SAJ | B110 | A107 | Conference with Pattis and email to co-counsel to object to demand estate incur expense to travel to Georgia for testimony and retention of Pattis by estate to deal with Georgia vs Trump. | 0.50 | 300.00 |
| 10/09/2023 | CRM | B160 | A103 | Prepare 8th Monthly Fee Statement and email to Shelby Jordan for approval. | 0.50 | 125.00 |

Bankruptcy

| | | | | | Hours | |
|------------|-----|------|------|--|-------|--------|
| | CRM | B160 | A103 | Start draft of 2nd Interim Fee Statement. | 1.10 | 275.00 |
| | SAJ | B110 | A106 | Call to client to verify not contacting McGill directly subpoena from GA State Court. | 0.30 | 180.00 |
| 10/10/2023 | CRM | B160 | A103 | File 8th Monthly Fee Statement and serve same. | 0.30 | 75.00 |
| | SAJ | B110 | A107 | Conference with Pattis regarding Georgia subpoenas and objection by client and call to client regarding same. | 0.60 | 360.00 |
| 10/12/2023 | SAJ | B110 | A107 | Conference with Ray Battaglia regarding issues with McGill and plan confirmation without agreements between Texas and Connecticut Plaintiffs. | 0.30 | 180.00 |
| | SAJ | B110 | A106 | Email and call from client on meeting in Houston without invitation to attend. | 0.20 | 120.00 |
| 10/16/2023 | SAJ | B110 | A107 | Review email from co-counsel regarding budget of fees and reply. | 0.40 | 240.00 |
| 10/19/2023 | SAJ | B110 | A107 | Conference with co-counsel and email regarding budgeting. | 0.20 | 120.00 |
| | SAJ | B110 | A106 | Conference with client regarding MSJ rulings TX and Conn and set up meeting tomorrow. | 0.50 | 300.00 |
| | SAJ | B110 | A107 | Conference wit co-counsel regarding rulings. | 0.20 | 120.00 |
| | SAJ | B110 | A107 | Conference with Norm Pattis regarding Georgia subpoena and representation locally of Alex Jones and MSJ ruling in Conn case. | 1.00 | 600.00 |
| | SAJ | B310 | A104 | Read both MSJ rulings by Court and outline issues and questions to co-counsel handling briefing and arguments. | 0.60 | 360.00 |
| 10/20/2023 | SAJ | B190 | A106 | Meeting in office with client regarding Court's MSJ orders. | 1.30 | 780.00 |
| | SAJ | B190 | A107 | Call to co-counsel and telephone conference with co-counsel and MSJ team to discuss orders and going forward strategy. | 0.80 | 480.00 |
| 10/23/2023 | SAJ | B110 | A106 | Call and conference with client regarding issue of non-payment of salary and MSJ and continued decision to work. | 0.80 | 480.00 |
| 10/24/2023 | SAJ | B110 | A106 | Conference with client and conference with co-counsel regarding ongoing refusal to adjust salary and ongoing refusal to fund administrative expense. | 1.10 | 660.00 |
| 10/26/2023 | SAJ | B110 | A106 | Telephone conference with client regarding strategy regarding MSJ, Lopez docket, current issues with Sub Ch V lawyer and potential resignation and update on turmoil in SDTX system. | 0.50 | 300.00 |
| 10/27/2023 | SAJ | B110 | A106 | Follow up call with client regarding strategy in face of SDTX docket and judge issues and appeal. | 0.60 | 360.00 |

JONES, ALEX

November 06, 2023

Account No: 5481-002000M
Statement No: 922768

Bankruptcy

| | | | | | |
|--|-------------------------------|--|--|--------------|----------|
| | | | | <u>Hours</u> | |
| | For Current Services Rendered | | | 17.60 | 9,895.00 |

| | | | | | |
|-------------------|--|----------------|--------------|-------------|--------------|
| | | | | | |
| | | Recapitulation | | | |
| <u>Timekeeper</u> | | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| SHELBY A. JORDAN | | Partners | 15.70 | \$600.00 | \$9,420.00 |
| CHRYSTAL MADDEN | | Paralegals | 1.90 | 250.00 | 475.00 |

| | | | | | |
|--|--------------------|--|--|--|----------|
| | Total Current Work | | | | 9,895.00 |
|--|--------------------|--|--|--|----------|

| | | | | | |
|--|-------------|--|--|--|---------------------|
| | Balance Due | | | | <u>\$122,514.63</u> |
|--|-------------|--|--|--|---------------------|

Task Code Summary

| | | | | |
|------|--|--|-------------|-----------------|
| | | | <u>Fees</u> | <u>Expenses</u> |
| B110 | Case Administration | | 6900.00 | 0.00 |
| B160 | Fee/Employment Applications | | 475.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | | 2160.00 | 0.00 |
| B100 | Administration | | 9,535.00 | 0.00 |
| B310 | Claims Administration and Objections | | 360.00 | 0.00 |
| B300 | Claims and Plan | | 360.00 | 0.00 |

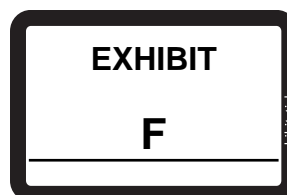
The entry N/C signifies time spent for which there will be no charge.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**TENTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

| | | |
|--|-----------------------------------|---------------|
| Name of Applicant: | Jordan & Ortiz, P.C. (“J&O”) | |
| Applicant’s Role in Case: | Co-Counsel to Debtor | |
| Date Order of Appointment Signed: | January 20, 2023 (Dkt #105) | |
| | Beginning of Period | End of Period |
| Time Period Covered in Statement: | 11/01/2023 | 11/30/2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total Fees Requested in this Statement: | \$5,092.00 (80% of \$6,365.00) | |
| Total Reimbursable Expenses Requested in this Statement: | \$65.00 ¹ | |
| Summary Attorney Fees for the Period Covered by this Statement | | |
| Attorneys Fees in this Statement: | \$6,240.00 | |
| Total Actual Attorneys Hours Covered by this Statement: | 10.40 | |
| Average Hourly Rate for Attorneys: | \$600.00 | |
| Summary Paraprofessional Fees for the Period Covered by this Statement | | |
| Paraprofessional Fees Requested in this Statement: | \$125.00 | |
| Total Actual Paraprofessional Hours Covered by this Statement: | 0.50 | |
| Average Hourly Rate for Paraprofessionals: | \$250.00 | |



¹ The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

RELIEF REQUESTED

1. This is Jordan & Ortiz, P.C.’s (“J&O”) ninth monthly fee statement for compensation (the “Fee Statement”) for the period of November 1, 2023 through November 30, 2023 (the “Fee Period”) pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the “Interim Compensation Order”). J&O is filing its ninth monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$5,092.00 (80% of \$6,365.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$65.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

SERVICES RENDERED AND DISBURSEMENTS INCURRED

2. Attached as Exhibit “A” is the Fee Statement for the period November 1, 2023 through November 30, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person’s billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed

in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$5,092.00 (80% of fees in the amount of \$6,365.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$65.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$5,157.000 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: December 12, 2023

/s/ Shelby A. Jordan
 SHELBY A. JORDAN
 State Bar No. 11016700
 S.D. No. 2195
 ANTONIO ORTIZ
 State Bar No. 24074839
 S.D. No. 1127322
Jordan & Ortiz, P.C.
 500 North Shoreline Blvd., Suite 804
 Corpus Christi, TX 78401
 Telephone: (361) 884-5678
 Facsimile: (361) 888-5555
 Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com
 Copy to: cmadden@jhwclaw.com
CO-COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on December 12, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, dallaseservice@crowedunlevy.com)
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

EXHIBIT “A”

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

500 N. SHORELINE BLVD, SUITE 804
CORPUS CHRISTI, TEXAS 78401-0341
TAX ID NO. 74-2553880
(361) 884-5678

JONES, ALEX
alexejones1777@gmail.com

Page: 1
December 06, 2023
Account No: 5481-002000M
Statement No: 922835

Bankruptcy

| PREVIOUS BALANCE | | | | | \$122,514.63 | |
|------------------|-----|------|------|---|--------------|----------|
| | | | | | Hours | |
| 11/02/2023 | SAJ | B110 | A107 | Conference with co-counsel regarding new developments in plan, negotiations, status of pending claims in Texas and client position. | 0.30 | 180.00 |
| | SAJ | B110 | A106 | Conference with client. | 0.40 | 240.00 |
| 11/05/2023 | SAJ | B110 | A106 | Call from client regarding status of appeals and potential for settlements. | 0.30 | 180.00 |
| 11/09/2023 | CRM | B160 | A103 | Prepare 9th Monthly Fee Notice and file and serve same. | 0.50 | 125.00 |
| 11/10/2023 | SAJ | B110 | A104 | Review budget from co-counsel and work on budget and forward. | 0.60 | 360.00 |
| | SAJ | B210 | A104 | Review brief and edit for Texas appeal and copy to Chris Martin. | 1.00 | 600.00 |
| 11/12/2023 | SAJ | B110 | A106 | Call to client regarding statement in broadcast about resolutions. | 0.20 | 120.00 |
| 11/13/2023 | SAJ | B190 | A104 | Review proposal by Debtors for settlement and calls to co-counsel and call from and to Battaglia. | 1.70 | 1,020.00 |
| 11/14/2023 | SAJ | B190 | A103 | Work on additional edits to the proposed settlement outline. | 0.70 | 420.00 |
| 11/15/2023 | SAJ | B130 | A106 | Review and telephone conference with client regarding sale of exempt assets on-line. | 0.30 | 180.00 |
| 11/16/2023 | SAJ | B110 | A103 | Pull and prepare initial accounting to disclose any funds paid for bankruptcy advise and petition preparation in the SOFA. | 0.80 | 480.00 |
| | SAJ | B110 | A107 | Review and forward to co-counsel Jay Wolman's email regarding client's claim against Erica Garbatini bankruptcy. | 0.40 | 240.00 |
| | SAJ | B410 | A106 | Call from client regarding sale of his exempt property and reminder of Governor Conoly's Chapter 7 sale of his | | |

JONES, ALEX

December 06, 2023

Account No: 5481-002000M

Statement No: 922835

Bankruptcy

| | | | | | | |
|-------------------|-----|--------------|------|--|---------------|---------------------|
| | | | | non-exempt property. | Hours 0.40 | 240.00 |
| 11/21/2023 | SAJ | B110 | A107 | Emails to co-counsel regarding status of settlement and NY trip and call to client regarding same. | 0.40 | 240.00 |
| 11/22/2023 | SAJ | B110 | A107 | Email and call to co-counsel regarding 2004 exam of Bob R and status of NY trip and settlement and review motion for status conference and issues raised by Motion and MOR filed. | 0.50 | 300.00 |
| | SAJ | B110 | A104 | Review exhibit list for client question on EGS hearing on rejection of contacts (whiskey, EGS Agr). | 0.30 | 180.00 |
| | SAJ | B320 | A104 | Begin analysis on bean transactions and claim by GrainChain to disclaim profits and emails and call to Dundon Advisors. | 0.20 | 120.00 |
| 11/27/2023 | SAJ | B110 | A107 | Email to co-counsel on issues of hearing and \$650k salary for client and status of NY Settlement trip. | 0.20 | 120.00 |
| | SAJ | B110 | A107 | Call to Battaglia regarding hearing outcome, Judge response to motions and status of NY Settlement negotiations. | 0.50 | 300.00 |
| | SAJ | B110 | A104 | Review memo of status of offers exchanged to settle matters and telephone conference with co-counsel. | 0.20 | 120.00 |
| | SAJ | B320 | A104 | Review motion for creditor plan. | 0.30 | 180.00 |
| 11/29/2023 | SAJ | B110 | A107 | Call from Battaglia regarding funds sent by Axios from prior Chapter 11 of Health to address in Victoria and conference with Chrystal Madden to get report of location of check and call to ex CRO account name for direction. | 0.70 | 420.00 |
| | | | | For Current Services Rendered | 10.90 | 6,365.00 |
| Recapitulation | | | | | | |
| <u>Timekeeper</u> | | <u>Title</u> | | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| SHELBY A. JORDAN | | Partners | | 10.40 | \$600.00 | \$6,240.00 |
| CHRYSTAL MADDEN | | Paralegals | | 0.50 | 250.00 | 125.00 |
| 11/30/2023 | | B110 | E106 | Pacer | | 65.00 |
| | | | | Total Expenses | | 65.00 |
| | | | | Total Current Work | | 6,430.00 |
| | | | | Total Payments | | -28,915.38 |
| | | | | Balance Due | | <u>\$100,029.25</u> |

Bankruptcy

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 3480.00 | 65.00 |
| B130 | Asset Disposition | 180.00 | 0.00 |
| B160 | Fee/Employment Applications | 125.00 | 0.00 |
| B190 | Other Contested Matters (excluding assumption/rejection motions) | 1440.00 | 0.00 |
| B100 | Administration | 5,225.00 | 65.00 |
| B210 | Business Operations | 600.00 | 0.00 |
| B200 | Operations | 600.00 | 0.00 |
| B320 | Plan and Discosure Statement (including Business Plan) | 300.00 | 0.00 |
| B300 | Claims and Plan | 300.00 | 0.00 |
| B410 | General Bankruptcy Advice/Opinions | 240.00 | 0.00 |
| B400 | Bankruptcy-Related Advice | 240.00 | 0.00 |

Your trust account #1 balance is

| | | |
|------------|--------------------------------------|------------|
| | Opening Balance | \$0.00 |
| 11/16/2023 | Interim Wire Payment | 28,915.38 |
| 11/16/2023 | Payment on 922268, 922376 and 922405 | -28,915.38 |
| | Closing Balance | \$0.00 |

The entry N/C signifies time spent for which there will be no charge.

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED
TO BE PAID UNDER DOCKET #346²**

| <u>Invoice No.</u> | <u>Month Billed</u> | <u>Invoice Date</u> | <u>Fees</u> | <u>Expenses</u> | <u>Invoice Total</u> | <u>Amount Applied</u> | <u>Interim Amount Applied Per #346</u> | <u>Remaining Balance Due</u> |
|------------------------------|---------------------|---------------------|---------------------|-------------------|----------------------|-----------------------|--|------------------------------|
| First Fee Application | | | | | | | | |
| 922199 | December | 1/27/23 | \$77,362.50 | \$506.65 | \$77,869.15 | -\$62,396.65 | \$15,472.50 | \$0.00 |
| 922213 | January | 2/15/23 | \$28,125.00 | \$102.50 | \$28,227.50 | -\$22,602.50 | \$5,625.00 | \$0.00 |
| 922268 | February | 3/2/23 | \$51,205.00 | \$22.44 | \$51,227.44 | -\$40,986.44 | \$10,241.00 | \$0.00 |
| 922376 | March | 4/6/23 | \$46,820.00 | \$120.30 | \$46,940.30 | -\$20,804.57 | \$26,135.73 | \$0.00 |
| 922405 | April | 5/4/23 | \$15,560.00 | \$0.00 | \$15,560.00 | \$0.00 | \$2,168.44 | \$13,391.56 |
| 922449 | May 1-15 | 5/18/23 | \$24,550.00 | \$315.70 | \$24,865.70 | \$0.00 | | \$24,865.70 |
| | | TOTALS | \$243,622.50 | \$1,067.59 | \$244,690.09 | -\$146,790.16 | \$59,642.67 | \$38,257.26 |

² Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023

EXHIBIT “B”**TASK CODES**

| <u>CATEGORIES</u> | <u>ATTORNEY TIME</u> | <u>PARALEGAL TIME</u> |
|--|-----------------------------|------------------------------|
| B110 Case Administration | 5.80 | |
| B120 Asset Analysis and Recovery | | |
| B130 Asset Disposition | 0.30 | |
| B140 Relief from Stay/Adequate Protection | | |
| B150 Meetings of & Communications with Creditors | | |
| B160 Fee/Employment Applications | | 0.50 |
| B170 Fee/Employment Objections | | |
| B180 Avoidance Action Analysis | | |
| B185 Assumption/Rejection of Executory Contracts | | |
| B190 Other Contested Matters | 2.40 | |
| B195 Non-Working Travel | | |
| B210 Business Operations | | |
| B220 Employee Benefits/Pensions | | |
| B230 Financing/Cash Collections | | |
| B240 Tax Issues | | |
| B250 Real Estate | | |
| B260 Board of Directors Matters | | |
| B310 Claims Administration and Objections | | |
| B320 Plan and Disclosure Statement | 0.50 | |
| B410 General Bankruptcy Advice/Opinions | 0.40 | |
| B420 Restructurings | | |
| TOTALS: | 10.40 | 0.50 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--------------------|---|----------------------------|
| IN RE |) | |
| |) | |
| ALEXANDER E. JONES |) | CASE No. 22-33553 |
| |) | |
| DEBTOR. |) | (CHAPTER 11) |
| |) | |
| |) | JUDGE CHRISTOPHER M. LOPEZ |

**ORDER GRANTING SECOND INTERIM APPLICATION OF JORDAN & ORTIZ, P.C.
FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES INCURRED FOR THE PERIOD FROM
MAY 16, 2023 TO NOVEMBER 30, 2023**

On this day came on for consideration the Second Interim Application of JORDAN & ORTIZ, P.C., Co-Counsel to Alexander E. Jones, (“Debtor”) for legal services rendered from May 16, 2023 through November 30, 2023. (the “Application”) seeking allowance of compensation incurred during such period of time, and it appears that notice, and service of such Application has been made in accordance with the Federal Rules of Bankruptcy Procedure and the Local Rules promulgated thereunder, and after considering the pleadings of record and the arguments of counsel;

THE COURT FINDS that the legal services provided by Applicant were necessary and beneficial to the estate and that the fees and expenses sought are reasonable after considering the following factors: (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the customary fee; (4) whether the fee is fixed or contingent; (5) the amount involved and the results obtained; (6) the experience, reputation and ability of the professionals; (7) the “undesirability” of the case; and (8) awards in similar cases.

IT APPEARING that to the extent herein provided, that interim compensation and reimbursement of out-of-pocket expenses should be authorized; it is, therefore,

ORDERED that the JORDAN & ORTIZ, P.C. shall be, and hereby is awarded INTERIM compensation of fees in the amount of **Sixty-One Thousand Four Hundred Fifty-Five Dollars (\$61,455.00)** for services rendered and expenses of **Three Hundred Sixteen Dollars and 99/100 (\$316.99)** incurred as legal counsel to the Debtor for the period from May 16, 2023 through November 30, 2023, it is further,

ORDERED that the Debtor is authorized to pay JORDAN & ORTIZ, P.C. the balance of the allowed fees and expenses owed after crediting all payments pursuant to the Interim Compensation Order.

Houston, Texas

Dated: _____

UNITED STATES BANKRUPTCY JUDGE

JORDAN & ORTIZ, PC
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 June 11, 2024
 Account No: 5481-002000M
 Statement No: 923214

Bankruptcy

| PREVIOUS BALANCE | | | | | \$56,940.92 | |
|------------------|-----|------|------|---|-------------|----------|
| | | | | | Hours | |
| 05/01/2024 | SAJ | B110 | A107 | Conference with co-counsel and conference regarding Plaintiffs counsel regarding suggestion of liquidating plan and joint agreement. | 1.60 | 960.00 |
| | SAJ | B110 | A103 | Work on questions of post-confirmation liquidating plan and retained jurisdiction over FSS (without continued control over debtor and post confirmation estate and continue research of on post-confirmation conduct and risk (work on confidential memo V4). | 2.10 | 1,260.00 |
| | SAJ | B110 | A107 | Reply to Catmul email regarding answer due in discharge litigation. | 0.30 | 180.00 |
| 05/02/2024 | SAJ | B110 | A103 | Work on outline additions to post confirmation of liquidating plan and status of issues involving post-confirmation work, earning, exemptions, etc. | 3.40 | 2,040.00 |
| 05/04/2024 | SAJ | B110 | A106 | Call from and conference with client regarding issues of liquidating plan and post-confirmation status. | 1.00 | 600.00 |
| 05/06/2024 | SAJ | B110 | A103 | Work on edits to outline of post-confirmation strategy for client and meeting with client regarding same. | 3.80 | 2,280.00 |
| 05/08/2024 | SAJ | B110 | A106 | Telephone call from client and work on issues of post-confirmation prenups and related issues with current administrative claims. | 2.20 | 1,320.00 |
| | SAJ | B110 | A107 | Telephone conference with [REDACTED] regarding PQPR and mediation. | 0.30 | 180.00 |
| | SAJ | B110 | A106 | Conference with client regarding likely conversion date and potential results and research employment issues if needed for liquidation and exit confirmation with protected funds. | 2.80 | 1,680.00 |
| | SAJ | B320 | A106 | Call to client, co-counsel and Bob S. regarding status of potential liquidating plan and issue of FSS joining liquidation | | |

Bankruptcy

| | | | | Hours | |
|------------|-----|------|---|-------|----------|
| | | | plan process or conversion and contrast results and set up meeting to discuss terms and any counteroffers. | 0.60 | 360.00 |
| 05/09/2024 | SAJ | B110 | A106 Conference with client regarding meeting and issues and set up sunday meeting. | 0.20 | 120.00 |
| | SAJ | B110 | A103 Work on strategy outline research on issues raised by co-counsel and Steve Lemmon. | 2.10 | 1,260.00 |
| 05/10/2024 | SAJ | B110 | A106 Call to [REDACTED] and conference with client regarding exit strategy and protocol. | 1.30 | 780.00 |
| | SAJ | B110 | A107 Reply to email from [REDACTED] regarding circulation of confidential production. | 0.30 | 180.00 |
| | SAJ | B110 | A107 Email and response to Bob S. regarding meeting next week in Austin. | 0.40 | 240.00 |
| 05/12/2024 | SAJ | B110 | A106 Call and conference with client regarding liquidating plan issues and distinction from conversion to Ch 7. | 0.70 | 420.00 |
| | SAJ | B110 | A106 In office meeting with client and review all aspects of proposed liquidating plans and impact on pending appeals, etc. | 4.00 | 2,400.00 |
| | SAJ | B320 | A104 Review draft of liquidating plan sent by committee and dismissal of all appeals. | 0.80 | 480.00 |
| 05/13/2024 | SAJ | B110 | A103 Edits to initial employment memo work product for potential assistance in selling remaining inventory and terms necessary to accomplish and discuss with client. | 1.00 | 600.00 |
| | SAJ | B320 | A104 Review redline copy of potential liquidating plan. | 2.00 | 1,200.00 |
| 05/14/2024 | SAJ | B320 | A107 Work on liquidating plan issues and prepare and attend conference with Plaintiffs counsel and co-counsel. | 1.00 | 600.00 |
| | SAJ | B320 | A106 Office meeting with Bob S., client and co-counsel and work on terms and provisions of liquidating plan and develop memo and outline of agreements and disagreement. | 5.10 | 3,060.00 |
| 05/15/2024 | SAJ | B110 | A106 Conference with client regarding demand to dismiss all appeals (Conn, Tex., Judge Lopez non-discharge) and conference for counter-offer, debtor's employment agreement and outstanding issues remaining administrative claims. | 2.00 | 1,200.00 |
| | SAJ | B110 | A106 Conference with co-counsel, Bob S. and client at client's office. | 3.60 | 2,160.00 |
| | SAJ | B110 | A107 Conference with third party counsel regarding debtor's employment agreement. | 1.00 | 600.00 |
| 05/16/2024 | SAJ | B110 | A106 Conference with client and [REDACTED] regarding liquidation plan and counteroffer compared to conversion and need for | | |

Bankruptcy

| | | | | | | |
|------------|-----|------|------|--|---------------|-----------|
| | | | | liquidation salary paid as protected income to client. | Hours 2.00 | 1,200.00 |
| | SAJ | B110 | A102 | Work on research regarding post petition earning due and post conversion earning paid and issues related to forced conversion and dealings with new Trustee in Ch 7 required of client. | 3.70 | 2,220.00 |
| 05/17/2024 | SAJ | B110 | A106 | Conference with client regarding response to counter-offer and status of response rejecting and calls to domestic relations lawyer and related issues regarding post confirmation/conversion status. | 1.00 | 600.00 |
| 05/19/2024 | SAJ | B110 | A106 | Telephone conference with client regarding current status of plan and post confirmation/conversion status and strategies. | | 0.50 |
| | SAJ | B110 | A104 | Work on plan confirmation and post plan confirmation or conversion. | 2.80 | 1,680.00 |
| 05/20/2024 | SAJ | B110 | A104 | Review fifth circuit case that deals with exceptions to discharge in corporate subchapter V cases and notice filed by Plaintiffs and conference with client. | 1.00 | 600.00 |
| | SAJ | B210 | A107 | Conference with counsel regarding interim operations of FSS to sell product remaining and for [REDACTED] and his lawyer and conference with client regarding meeting discussions. | 2.00 | 1,200.00 |
| 05/21/2024 | SAJ | B110 | A106 | In office conference with client regarding issues of liquidating plan and continued selling to reduce supplements inventory by client and alternatives if no confirmation. | 2.10 | 1,260.00 |
| | SAJ | B110 | A107 | Conference with Vicki Driver and [REDACTED] regarding status conference and expected outcome of FSS and of liquidating plan of Jones and conference with client regarding their input. | 1.80 | 1,080.00 |
| 05/22/2024 | SAJ | B110 | A106 | Meeting in office with client regarding yesterday's status conference and court's comments and parties positions in response and several telephone conference with client regarding same. | 1.80 | 1,080.00 |
| | SAJ | B110 | A107 | Meeting with Bob S. regarding current status and current response to issues of liquidating plan, conversion and continued operations to liquidate collateral. | 3.10 | 1,860.00 |
| 05/23/2024 | SAJ | B110 | A107 | Telephone conference with [REDACTED] and co-counsel regarding outcome of status conference and potential regarding liquidating plans. | 1.10 | 660.00 |
| | | | | For Current Services Rendered | 66.00 | 39,600.50 |

Bankruptcy

| <u>Timekeeper</u> | <u>Recapitulation</u> | | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|-----------------------|----------|--------------|-------------|--------------|
| SHELBY A. JORDAN | <u>Title</u> | Partners | 66.00 | \$600.00 | \$39,600.50 |

| | | | | | |
|------------|------|------|-------------------------|--|--------------------|
| 05/31/2024 | B110 | E106 | Online research - Lexis | | 10.22 |
| | | | Total Expenses | | 10.22 |
| | | | Total Current Work | | 39,610.72 |
| | | | Total Payments | | -26,996.52 |
| | | | Balance Due | | <u>\$69,555.12</u> |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|--|-------------|-----------------|
| B110 | Case Administration | 32700.50 | 10.22 |
| B100 | Administration | 32,700.50 | 10.22 |
| B210 | Business Operations | 1200.00 | 0.00 |
| B200 | Operations | 1,200.00 | 0.00 |
| B320 | Plan and Discosure Statement (including Business Plan) | 5700.00 | 0.00 |
| B300 | Claims and Plan | 5,700.00 | 0.00 |

Your trust account #1 balance is

| | | |
|------------|---------------------------|---------------|
| | Opening Balance | \$0.00 |
| 05/30/2024 | Interim Wire Payment | 26,996.52 |
| 06/05/2024 | Payment on 923029, 923089 | -26,996.52 |
| | Closing Balance | <u>\$0.00</u> |

The entry N/C signifies time spent for which there will be no charge.

| | |
|---------------------|-----------|
| Statements Printed: | 1 |
| Hours: | 66.00 |
| Fees: | 39,600.50 |
| Expenses: | 10.22 |

JORDAN & ORTIZ, PC
 500 N. SHORELINE BLVD, SUITE 804
 CORPUS CHRISTI, TEXAS 78401-0341
 TAX ID NO. 74-2553880
 (361) 884-5678

JONES, ALEX
 alexejones1777@gmail.com

Page: 1
 June 26, 2024
 Account No: 5481-002000M
 Statement No: 923261

Bankruptcy

| PREVIOUS BALANCE | | | | \$69,555.12 | |
|------------------|-----|------|------|---|---------------|
| | | | | Hours | |
| 06/09/2024 | SAJ | B110 | A104 | Begin analysis conversions and access to assets and issues involving non-final judgment and objections to claims in Chapter 11 case pre-conversion. | 4.00 2,400.00 |
| | SAJ | B110 | A104 | Jurisdiction of federal court over Connecticut Plaintiffs efforts to initial collection proceedings on non-final judgment with non-allowed claims. | 0.70 420.00 |
| | SAJ | B110 | A104 | Status of appeals from Bankruptcy Court judgments on non-dischargeability. | 0.60 360.00 |
| 06/10/2024 | SAJ | B110 | A106 | Call with client regarding status of potential conversions of both debtors. | 1.10 660.00 |
| | SAJ | B110 | A107 | Conference with Bob Schleizer regarding potential conversions of both debtors. | 0.30 180.00 |
| | SAJ | B110 | A107 | Conference with Norm Pattis regarding status of appeal. | 0.60 360.00 |
| | SAJ | B110 | A103 | Work on memo regarding objection to claims of Plaintiffs and status of any supersedeas obligation for collection of Texas and Conn non-final judgments and circulate memo on status of exemption and execution of non-final judgment. | 3.70 2,220.00 |
| 06/11/2024 | SAJ | B110 | A106 | Attend client conference at his location. | 2.00 1,200.00 |
| | SAJ | B110 | A107 | Conference on status of all matters with co-counsel and advisors. | 4.00 2,400.00 |
| | SAJ | B110 | A107 | Conference call with [REDACTED] regarding post conversion considerations. | 1.50 900.00 |
| 06/12/2024 | SAJ | B110 | A106 | Meeting in my office with co-counsel, advisors and client and prepare for hearing on Friday. | 5.30 3,180.00 |
| | SAJ | B110 | A103 | Work on post hearing documents in the event of FSS or Jones | |

Bankruptcy

| | | | | Hours | |
|--|-----|------|--|-------|-----------|
| conversion, inc;luding issues of election of trustees by Plaintiffs. | | | | 2.70 | 1,620.00 |
| 06/13/2024 | SAJ | B110 | A106 Meeting with co-counsel and advisors and client and prepare for Friday hearing and continue briefing on issues of conversion. | 6.60 | 3,960.00 |
| | SAJ | B110 | A106 Conference with client and co-counsel and ██████ regarding post conversion income and earning and related issues. | 2.10 | 1,260.00 |
| 06/14/2024 | SAJ | B110 | A106 Trip to Houston and conference with client and co-counsel and prepare and attend hearing. | 11.00 | 6,600.00 |
| | SAJ | B110 | A106 Post hearing meeting and conference with client and post confirmation final order issues and prepare report of future strategy. | 2.10 | 1,260.00 |
| | CRM | B160 | A103 Prepare draft of final fee application and email same to Shelby Jordan. | 0.80 | 200.00 |
| For Current Services Rendered | | | | 49.10 | 29,180.00 |

| Recapitulation | | | | |
|-------------------|--------------|--------------|-------------|--------------|
| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
| SHELBY A. JORDAN | Partners | 48.30 | \$600.00 | \$28,980.00 |
| CHRYSTAL MADDEN | Paralegals | 0.80 | 250.00 | 200.00 |

| | | | | |
|--------------------|------|------|--------------------------------|--------------------|
| 06/14/2024 | B110 | E102 | Rainmaker - Copies for Hearing | 95.10 |
| 06/14/2024 | B110 | E107 | Fed Ex | 124.18 |
| Total Expenses | | | | 219.28 |
| Total Current Work | | | | 29,399.28 |
| Total Payments | | | | -10,831.64 |
| Balance Due | | | | <u>\$88,122.76</u> |

| <u>Task Code Summary</u> | | | <u>Fees</u> | <u>Expenses</u> |
|--------------------------|-----------------------------|--|-------------|-----------------|
| B110 | Case Administration | | 28980.00 | 219.28 |
| B160 | Fee/Employment Applications | | 200.00 | 0.00 |
| B100 | Administration | | 29,180.00 | 219.28 |

Bankruptcy

Your trust account #1 balance is

| | | |
|------------|----------------------|------------|
| | Opening Balance | \$0.00 |
| 06/14/2024 | Interim Wire Payment | 10,831.64 |
| 06/20/2024 | Payment on 923089 | -10,831.64 |
| | Closing Balance | \$0.00 |

The entry N/C signifies time spent for which there will be no charge.